Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit D. Land Use

Submitted to
Oregon Energy Facility Siting Council

Prepared for

Speedway Energy

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
Applicant	BGTF Speedway Project LLC
ASC	Application for Site Certificate
BESS	battery energy storage system
BMP	best management practices
BPA	Bonneville Power Administration
CRP	Conservation Reserve Program
EFSC	Oregon Energy Facility Siting Council
EFU	Exclusive Farm Use
ESCP	Erosion and Sediment Control Plan
Facility	Speedway Energy Facility
gen-tie	generation-tie
HMP	Habitat Mitigation Plan
kV	kilovolt
MCEDD	Mid-Columbia Economic Development District
NH	Natural Hazards
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resources Conservation Service
NRHP	National Register of Historic Places
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ODFW	Oregon Department of Fish and Wildlife
ODOE	Oregon Department of Energy
ODOT	Oregon Department of Transportation
ORS	Oregon Revised Statutes
POI	point of interconnection
RFPD	Rural Fire Protection District
SCCP	Sherman County Comprehensive Plan
SCZO	Sherman County Zoning Ordinance
SR	Significant Resource
TIS	Traffic Impact Study
TLT	transient lodging tax
US-#	U.S. Route [designation]
USDA	U.S. Department of Agriculture
VSMP	Vegetation and Soil Management Plan

1.0 Introduction

BGTF Speedway Project LLC (Applicant) proposes construction and operation of the Speedway Energy Facility (Facility), a renewable energy facility incorporating wind, solar, and battery energy storage, located on privately owned land in unincorporated Sherman County, Oregon. The Facility's proposed point of interconnection (POI) to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt (kV) Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary. The Facility will construct a short stretch of 500-kV generation-tie (gen-tie) transmission line that spans aboveground from the Facility's proposed central substation to the BPA switchyard. This aboveground gen-tie transmission line will be approximately 650 feet in length based on the current design.

The Facility's site boundary encompasses approximately 23,936 acres of privately owned land zoned Exclusive Farm Use (EFU) and is bisected by U.S. Route 97 (US-97). Within the site boundary, discrete areas will be developed for solar arrays and wind turbines while avoiding sensitive areas and reserving areas for continued agricultural production. An overview of solar components and associated definitions is provided below in Section 3.1.1, an overview of wind components and associated definitions is provided below in Section 3.1.2, and an overview of shared components and associated definitions is provided below in Section 3.1.3.

The information contained herein Exhibit D supports demonstration of compliance with the Land Use submittal requirements and approval standard in Oregon Administrative Rules (OAR) 345-022-0030.

2.0 Land Use Analysis Area

The land use analysis area is the proposed site boundary plus a 0.5-mile buffer in accordance with OAR 345-001-0010(35)(c) and as confirmed by the May 2026 Project Order (ODOE 2026; Figure D-1). The northernmost portion of the site boundary is 3.3 miles southeast of the city of Moro, and the middle portion of the site boundary is 0.6 miles from the city of Grass Valley. The site boundary is defined in detail in the Background Information Exhibit.

The land use analysis area encompasses approximately 44,280 acres: approximately 23,936 acres within the Facility site boundary plus approximately 20,344 acres within the 0.5-mile buffer. The 20,344-acres area around the Facility site boundary is also referred to as the "surrounding lands" in Section 5.5.2.1 of this exhibit as part of the analysis required by OAR 660-033-0130(5).

3.0 Overview of Facility, Land Uses, Farmland Characteristics, and Agricultural Impacts/Mitigation

3.1 Facility Overview

The Facility's major components, structures, and systems are summarized below:

- Wind turbines including the nacelle, blades, rotor, tower, foundations, and generator step-up (GSU) transformers and transformer foundations, and associated switchgear; and
- Solar arrays which include modules, racking or tracker systems, posts, cabling, and inverters and transformers.

In addition to the major components described above, the Facility's related or supporting facilities will consist of the electrical collection system, battery energy storage system (BESS), operations and maintenance (O&M) areas; site access and service roads; perimeter fencing and gates; temporary construction areas; and communication and Supervisory Control and Data Acquisition (SCADA) systems.

The Facility does not include a transmission line that, by itself, is an energy facility under the definition in Oregon Revised Statutes (ORS) 469.300(12)(a)(C). The Facility does include aboveground 230-kV collector lines that will transport power to the central project substation, where the power will be stepped up to interconnection voltage and transmitted to the POI by a short 500-kV gen-tie transmission line. Comprehensive descriptions of Facility components are provided in the Background Information Exhibit and shown on Figure 3.1 of that exhibit.

3.1.1 Land Use Terms

The following key terms are relied on and referenced throughout this Exhibit D:

- *Site boundary*: the approximately 23,936-acre area of privately owned land in Sherman County, Oregon.
- *Micrositing area*: the approximately 22,278-acre field surveyed portion of the Facility site boundary, shown on Figure D-1, in which the Applicant proposes to site all Facility components (including solar, wind, and shared components as defined below).
- *Solar components*: solar modules, tracker systems and posts, inverters and transformers, and low-voltage cabling.
- *Solar Facility*: is a "photovoltaic solar power generation facility," defined under OAR 660-033-0130(38)(f). The Solar Facility consists of the solar components and shared components.
- *Wind components*: wind turbines, nacelles, blades and rotors, turbine towers, turbine foundations, and pad-mount transformer.
- *Wind Facility*: is a "wind power generation facility," defined under OAR 660-033-0130(37). The Wind Facility consists of the wind components and shared components.

- *Shared components*: includes electrical cable collection systems connecting the photovoltaic solar generation facility and the wind power generation facility to a transmission line or Facility substation, all necessary grid integration equipment, new or expanded private roads constructed to serve both the photovoltaic solar and wind power generation facilities, office, operation and maintenance buildings, temporary lay-down staging areas and all other necessary appurtenances.
- *Aboveground 230-kV collector lines:* a 14-mile-long portion of the collector system, supported by pole structures up to 135-feet tall, that connects the six collector substations to the central substation. It will not directly connect the Facility to the regional electrical grid.
- *500-kV Gen-tie transmission line:* a 650-foot-long associated transmission line (per ORS 469.300) that connects the central substation to the new BPA switchyard (to be located adjacent to the existing BPA 500-kV Ashe-Marion Transmission Line). It will directly connect the Facility to the regional electrical grid.
- *Goal 3 exception area*: up to 8,500 acres proposed to be permanently impacted by the Solar Facility, which includes the solar components and shared components (as defined above).
- *Facility components*: refers to all the components that collectively comprise the Facility. The Facility components are shown on Figure 3.1 of, and described in detail within, the Background Information Exhibit.

As outlined above, the Facility includes wind and solar components as well as components shared by the wind and solar facilities, as detailed in the Background Information Exhibit. The Applicant is requesting to site Facility components within the 22,278-acre micrositing area. This will provide for micrositing flexibility in anticipation of technological advances and offering maximum efficiency in use of space. This flexibility also provides development flexibility for varying market requirements for potential customers. The tracts[1] and taxlots associated with the Facility site boundary are outlined in Table D-1 below.

Table D-1. Identification of Tracts Associated with the Facility Site Boundary

Tract	Owner	Taxlot	In Care Of	Located within or intersect with Site Boundary? (Y/N)
1	POWELL, PATRICK A TRUSTEE	02S17E00001000		Yes
		02S17E00001600		Yes
		02S17E00001700		Yes
		02S17E00002800		Yes
	POWELL, PATRICK, TRUSTEE	02S17E0000700		Yes

[1] Per OAR 660-033-0020(14), "tract" means one or more contiguous lots or parcels under the same ownership.

Tract	Owner	Taxlot	In Care Of	Located within or intersect with Site Boundary? (Y/N)
2	PINKERTON RANCH	02S17E00002700	PINKERTON, T DEAN	Yes
	PINKERTON RANCHES	02S17E0000600		Yes
3	SODERLUND, CHRISTOPHER	02S17E00002900		Yes
4	SODERLUND, CHRISTOPHER	02S17E00003700		Yes
5	SIMPSON, NANCY J & RICHARD C	02S17E00003801		Yes
6	CAMPBELL, STEPHEN FARM & CABIN TRUST	02S17E00003800	GRANT SIMPSON	Yes
7	BARNETT, LEE	02S17E00005000		Yes
8	BLAGG, CARRIE L TRUSTEE	02S17E00004600		Yes
		02S17E00004800		Yes
		02S17E00004900		Yes
		03S17E0000601		Yes
9	ROLFE LAND & CATTLE CO LLC	02S16E00005100		Yes
		02S17E00005300		Yes
		02S17E00005400		Yes
10	BUCK HOLLOW RANCH INC	03S16E0000200		Yes
		03S16E0200100		Yes
		03S16E0200300		Yes
		03S16E0200400		Yes
11	EARL RANCH LLC	03S16E00001300		Yes
		03S16E0000400		Yes
12	BIRD, STEVEN & LINDA	03S16E00001000		Yes
		03S16E00001100		Yes
13	JUSTESEN, FRED & JONNIE	03S16E00001200		Yes
		03S16E00001700		Yes
14	SALOMON, PAULINE TRUSTEE	03S16E00001800		Yes
		03S16E00001900		Yes
15	JUSTESEN, FRED & JON	03S15E00002800		**No**
	JUSTESEN, FRED & JONNIE	03S15E00002400		**No**
		03S16E00002200		Yes
		03S16E00002700		Yes
	JUSTESEN, FRED A & JONNIE L	03S16E00002800		Yes
16	EARL RANCH LLC	03S16E00002900		Yes

Tract	Owner	Taxlot	In Care Of	Located within or intersect with Site Boundary? (Y/N)
17	JUSTESEN, FRED	03S16E00003100		Yes
	JUSTESEN, FRED & JON	03S16E00003000		Yes
		03S16E00003401		Yes
	JUSTESEN, FRED & JUSTESEN JON	03S16E00003200		Yes
18	BERGE, JAMES C ETAL	03S16E00004200	GUNDERSON, PEDER & GAIL	Yes
		04S16E00001400	GUNDERSON, PEDER & GAIL	Yes
19	SALOMON, PAULINE TRUSTEE	03S16E00003900		Yes
		04S16E00001300		Yes
20	RUGGLES, CATHERINE	03S16E00003802		**No**
	RUGGLES, JESSE	03S16E00003800	RUGGLES, CATHERINE	Yes
	RUGGLES, JESSE DEAN	04S16E0000900	CATHERINE ANN RUGGLES	**No**
		03S16E00003801	CATHERINE ANN RUGGLES	**No**
		03S16E00004300	RUGGLES, CATHERINE	**No**
		04S16E0000200	RUGGLES, CATHERINE	**No**
		04S16E0000500	CATHERINE ANN RUGGLES	**No**
		04S16E0000600	CATHERINE ANN RUGGLES	**No**
21	FINNEGAN RANCH LLC	03S16E00003400	HULBERT, JEAN	Yes
		03S16E00003600	HULBERT, JEAN	Yes
		03S16E00003700	HULBERT, JEAN	Yes
22	NOGLE, PAT	03S16E00003501		**No**
	NOGLE, PAT & NOGLE, WHITNEY	03S16E00003500		Yes
23	EARL RANCH LLC	03S17E00003900		Yes
		03S17E00004100		Yes
24	BOURBON ROAD RENEWABLES LLC	03S17E00004200		Yes
25	OLSEN PROPERTIES LLC	01S17E00008100		**No**
		02S17E0000900		Yes

3.1.2 Wind Facility Overview

The Wind Facility includes wind and shared components (see Section 3.1.1 – Land Use Terms above) and meets the definition of "wind power generation facility" as provided by OAR 660-033-0130(37). Compliance of the Wind Facility with OAR 660-033-0130(37) is demonstrated below in Section 5.5.2.2. To provide flexibility during final design, the Applicant requests the ability to site the Wind Facility within the 22,278-acre micrositing area; however, the permanent disturbance area associated with the layout of the Wind Facility is anticipated to be 195 acres, which includes 48 acres of wind-only components, plus 147 acres of components shared with the Solar Facility, resulting in a significantly smaller footprint than the micrositing area.

3.1.3 Solar Facility Overview

The Solar Facility includes solar and shared components (see Section 3.1.1 – Land Use Terms above) and meets the definition of "photovoltaic solar power generation facility" as provided by OAR 660-033-0130(38). Compliance of the Solar Facility with OAR 660-033-0130(38) is demonstrated below in Section 5.5.2.3. To provide flexibility during final design, the Applicant is requesting the ability to site the Solar Facility within the 22,278-acre micrositing area. However, the permanent disturbance area associated with the final design layout of the Solar Facility is anticipated to be no greater than 8,500 acres (this would include the total acreage of solar and shared components).

Consistent with Oregon law, the Applicant is requesting an exception from Statewide Planning Goal 3 for an area of up to 8,500 acres of EFU land (see Section 5.7). For the purposes of analyzing the potential impacts to agricultural lands from the Solar Facility (Section 3.4), the Applicant used the preliminary design reflected in Figure 3.3 in the Background Information Exhibit. The preliminary design shows a total permanent footprint for the Solar Facility of 8,043 acres. However, as this design is preliminary, the Applicant is requesting a Goal 3 exception for a slightly larger area (i.e. 8,500 acres) to accommodate final design refinements, if needed. As discussed in Section 5.7.1.3, the preliminary design has been carefully developed based on input from participating landowners who will continue to conduct agricultural operations in key locations within the site boundary and on surrounding lands, and would site all solar components and shared components outside all high-value farmland as defined under ORS 195.300(10). Further, agricultural mitigation is proposed and would be calculated on a per-acre basis, with the final mitigation amount to be based on the permanent disturbance area of the Solar Facility reflected in the final design prior to construction. See Section 3.3.2.1 for more details regarding high-value farmland definitions and potential impacts to them by the Solar Facility. See Section 3.4.3 for more details regarding the proposed agricultural mitigation.

3.2 Overview of Existing Land Uses

The zoning designations, underlying land uses, and soil classifications within the site boundary and analysis area are relevant for purposes of analyzing the Facility's compliance with applicable substantive criteria and directly applicable state land use regulations. Figure D-2 shows the

Sherman County land use zones and comprehensive plan map designations within the site boundary and analysis area. All lands within the site boundary are zoned EFU (F-1). All lands within the analysis area are zoned EFU (F-1) with the exception of an approximately 295-acre area zoned Motor Sport Complex (MSC-1) which is associated with the Oregon Raceway Park. Figure D-3 shows the site boundary and analysis area in comparison to the Natural Hazards (NH) combining zone. Figure D-4 shows some areas within the site boundary that are located within the Significant Resource (SR) combining zone. Land use zones are discussed further in Section 5.2.1.

As shown in Table D-1 and Figure D-5, there are a total of 25 tracts within the site boundary. In support of the Application for Site Certificate (ASC), the Applicant conducted a survey of the tract landowners. The survey was designed to collect information on existing agricultural activities and land management practices to inform the agricultural land use analysis. Consistent with U.S. Department of Agriculture (USDA) Cropland Data Layer information, survey responses indicate that active agricultural use within the Facility site boundary is primarily composed of dryland winter wheat production or land enrolled in the USDA Conservation Reserve Program (CRP) with cattle grazing occurring on portions of the site boundary. A summary of these land uses is provided below and a summary of the landowner survey responses is provided in Section 3.4.2 in Table D-6.

Farmland characteristics, including water rights, soil classifications, and high-value farmland, are discussed in Section 3.3. Compliance with Sherman County applicable substantive criteria is discussed in Sections 5.2, 5.3, and 5.4, and compliance with directly applicable state land use regulations is discussed in Section 5.5.

3.2.1 Cultivated Lands

As shown on Figure D-6, significant portions of the Facility site boundary and micrositing area are composed of cultivated land. Cultivated land is considered land in annual or perennial crop production. Of the approximately 24,000 acres within the Facility site boundary, an estimated 10,569 acres are currently in winter wheat production, with approximately 5,285 acres harvested annually as part of a two-year rotation system. Although there are several small areas with place-of-use water rights in the site boundary (see Figure D-7 and Section 3.3.1), only one landowner reported having any irrigated crops (Tract 12; 33 acres of irrigated hay/barley)[2]. More information regarding existing agricultural uses and water rights is provided in Section 3.3.1. Exhibit G – Fish and Wildlife Habitat and Figure G-3 provide more detail on the surveyed habitats and ground cover.

3.2.2 Pastureland and Rangeland

Land is that is not clearly cultivated, physically developed or preserved for natural conservation is considered as rangeland. Rangeland, as defined by Britannica, is any extensive area of land that is occupied by native herbaceous or shrubby vegetation which is grazed by domestic or wild

[2] The 33 acres of irrigated hay/barley is associated with place-of-use water right G 34725. The preliminary layout avoids impacts to this irrigated land/place-of-use water right, and the final design will avoid impacts to this irrigated land/place-of-use water right.

herbivores. The vegetation of ranges may include tallgrass prairies, steppes (shortgrass prairies), desert shrublands, shrub woodlands, savannas, chaparrals, and tundras (Britannica 2026).

Based on landowner surveys, some of the rangeland within the Facility site boundary is in use for pastureland. As provided by the Agricultural Impact Analysis (Attachment D-1), five landowners reported grazing livestock on lands located both within and outside the Facility lease areas. Survey responses indicate that grazing operations are expected to continue on portions of existing ranching operations that would remain available following Facility construction, although detailed information regarding stocking rates, pasture management, or relocation plans was not provided (see Table D-6). Because cattle are mobile assets and grazing activities are anticipated to continue elsewhere within existing agricultural operations, the Facility is not expected to result in a reduction in countywide livestock production.[3]

3.2.3 Conservation Reserve Program

The CRP is a voluntary USDA program that compensates landowners for converting environmentally sensitive agricultural land into conservation cover through annual rental payments. CRP rental rates are generally based on local cropland lease rates and therefore vary over time and across geographic regions. A substantial amount of land in Sherman County is enrolled in CRP. In 2022, approximately 80,115 acres, representing roughly 15 percent of county land area, were enrolled in the program.[4] Over the period from 2012 to 2022, CRP enrollment within the county remained relatively stable, averaging approximately 77,500 acres annually. Looking forward, approximately 22,000 acres currently enrolled in CRP are scheduled to expire between 2025 and 2029, although these lands may be re-enrolled. In fiscal year 2022, Sherman County landowners received approximately $4.4 million in CRP rental payments. Average CRP rental payments in Sherman County were approximately $54 per acre in 2025 dollars, slightly below the statewide average of $61 per acre (USDA FSA 2020-2031, USDA FSA 2022).

Several landowners reported acreage enrolled in CRP (see Table D-6). Land enrolled in non-working lands CRP is not actively used for commercial agricultural production. One landowner reported grazing cattle on CRP associated with the Grasslands Program (a working lands program). The Grassland CRP can allow for grazing activities on the land as long as the land cover is maintained by the rancher (USDA FSA 2026a). While CRP acreage can in some circumstances represent an agricultural land use, it does not contribute to crop production.

[3] One discrepancy was identified between the responses provided by a lessee and the corresponding landowner regarding potential livestock impacts. The lessee indicated that livestock operations could be affected by the Facility but did not provide supporting information regarding the nature or magnitude of those impacts. In contrast, the landowner indicated that livestock operations would not be affected. Given the conflicting responses and the absence of evidence demonstrating a measurable or quantifiable impact, no impacts to livestock operations were identified or estimated as part of this analysis.
[4] By the end of the USDA CRP fiscal year, September 30th

3.3 Farmland Characteristics

3.3.1 Water Rights, Soil Classifications, and Productivity

3.3.1.1 Existing Irrigation Water Rights

None of the land within the Facility site boundary or micrositing area is within the boundaries of an irrigation or diking district. As shown on Figure D-7, there are nine documented place-of-use irrigation water rights within the Facility site boundary; however, only one (Permit G 34725, located in Tract 12) was reported to be in use for irrigated crop production by the landowner (33 acres of hay/barley; see Table D-6).[5] The remaining water rights in the site boundary were described by the respective landowners as not being used for irrigation (see Table D-6).

3.3.1.2 Soils Classifications

The Facility site boundary contains 22 soil types, pursuant to the National Resources Conservation Service (NRCS) geographic information system soil data, represented below in Table D-2. The NRCS database includes the physical and chemical properties of the soils in the analysis area and the soil map unit distribution. The NRCS assigns land capability classifications to each soil unit to show, in a general way, the suitability of soils for most kinds of field crops. Soils are grouped according to their limitations for field crops, the risk of damage if they are used for crops, and the way they respond to management (USDA 2026). Soil classifications can depend on whether the soils are irrigated. Table D-2 reflects and Figure D-8 depicts soil classifications for irrigated conditions for soils located within a place-of-use water right polygon (regardless of actual irrigation status).

3.3.1.3 Soil Productivity

Irrigated and non-irrigated average crop yields per acre by soil unit are identified in the NRCS soils report (USDA 2026). These average crop yields per acre assume a high level of management to obtain the indicated yields (application of fertilizer, control of weeds, erosion control, etc.) and are based mainly on the experience and records of farmers, conservationists, and extension agents (USDA 2026b). The most predominant soil classification within the site boundary is Condon silt loam, 1 to 7 percent slopes, which comprises approximately 49 percent of the Facility site boundary. The second most predominant soil classification is Cantala silt loam, which comprises approximately 12 percent of the site boundary. NRCS soil productivity estimates for dryland winter wheat within the Facility site boundary averages 36 bushels per acre (Attachment D-1). Wheat yields for these operations are reported by the landowners to average 37.5 bushels per acre over the past 5 to 10 years (see Table D-6).

[5] The 33 acres of irrigated hay/barley is associated with place-of-use water right G 34725. The preliminary layout avoids impacts to this irrigated land/place-of-use water right, and the final design will avoid impacts to this irrigated land/place-of-use water right.

Table D-2. Soil Classifications in Facility Site Boundary

Soil Type ID/Soil Unit	NRCS Farmland Classification	NRCS Irrigated Soil Capability Class	NRCS Non-Irrigated Soil Capability Class	Acreage within Facility Site Boundary	Irrigated Acreage within Facility Site Boundary	Non-Irrigated Acreage within Facility Site Boundary
10C / Condon-Bakeoven complex, 2 to 20 percent slopes	Farmland of statewide importance	-	III	6,174.3	49.9	6,124.4
11A / Endersby fine sandy loam, 0 to 3 percent slopes	Prime farmland if irrigated	I	II	43	-	43.0
12A / Endersby-Hermiston complex, 0 to 3 percent slopes	Prime farmland if irrigated	I	II	454.6	7.0	447.6
13A / Hermiston silt loam, 0 to 3 percent slopes	Prime farmland if irrigated	I	II	94.9	-	94.9
15D / Kuhl-Rock outcrop complex, 20 to 40 percent north slopes	Not prime farmland	-	VII	0.3	-	0.3
16D / Lickskillet very stony loam, 7 to 40 percent south slopes	Not prime farmland	-	VII	156.5	-	156.5
17C / Lickskillet-Bakeoven complex, 2 to 20 percent slopes	Not prime farmland	-	VII	406.4	-	406.4
18E / Lickskillet-Rock outcrop complex, 40 to 70 percent south slopes	Not prime farmland	-	VII	33.7	-	33.7
1B / Anderly silt loam, 1 to 7 percent slopes	Prime farmland if irrigated	-	III	559.7	-	559.7
1C / Anderly silt loam, 7 to 15 percent slopes	Farmland of statewide importance	-	III	320.9	-	320.9
22A / Pedigo silt loam, 0 to 3 percent slopes	Prime farmland if irrigated	II	III	1.4	-	1.4
2D / Anderly silt loam, 15 to 35 percent north slopes	Farmland of statewide importance	-	IV	7.3	-	7.3
31B / Walla Walla silt loam, 1 to 7 percent slopes	Prime farmland if irrigated	II	II	793.3	-	793.3
31C / Walla Walla silt loam, 7 to 15 percent slopes	Farmland of statewide importance	III	III	257	-	257.0
32D / Walla Walla silt loam, 15 to 35 percent north slopes	Farmland of statewide importance	-	IV	13.3	-	13.3
37E / Wrentham-Rock outcrop complex, 35 to 70 percent north slopes	Not prime farmland	-	VII	8	-	8.0
6C / Bakeoven very stony loam, 2 to 20 percent slopes	Not prime farmland	-	VII	15.9	-	15.9

Soil Type ID/Soil Unit	NRCS Farmland Classification	NRCS Irrigated Soil Capability Class	NRCS Non-Irrigated Soil Capability Class	Acreage within Facility Site Boundary	Irrigated Acreage within Facility Site Boundary	Non-Irrigated Acreage within Facility Site Boundary
7B / Cantala silt loam, 1 to 7 percent slopes	Prime farmland if irrigated	-	II	2,531.8	33.7	2,498.1
7C / Cantala silt loam, 7 to 15 percent slopes	Farmland of statewide importance	-	III	262.8	-	262.9
8B / Condon silt loam, 1 to 7 percent slopes	Prime farmland if irrigated	-	III	10,422.4	195.1	10,227.3
8C / Condon silt loam, 7 to 15 percent slopes	Farmland of statewide importance	-	III	1,335.1	-	1,335.1
9D / Condon silt loam, 15 to 35 percent north slopes	Farmland of statewide importance	-	IV	21.1	-	21.1
W / Water	Not prime farmland	-	-	22.4	-	22.4

3.3.2 Solar Facility High-Value Farmland and Arable Lands Analysis

In order to assess if a solar facility meeting the definition of OAR 660-033-0130(38)(f) may be authorized within the EFU zone, OAR 660-033-0130(38)(g) and (h) require the determination of the existence of "high-value farmland described at ORS 195.300(10)" within the area anticipated to be impacted by the solar facility. It is also necessary to determine if there are arable or nonarable lands within the area anticipated to be impacted by the solar facility. The following subsections provide this determination.

3.3.2.1 High-Value Farmland

Certain lands within the EFU zone, identified as the F-1 zone in Sherman County, are considered high-value farmland if they meet the definitions outlined in ORS 195.300(10). The applicable definitions are summarized below:

- ORS 195.300(10)(a) relies on land in the EFU zone meeting the description of high-value farmland under ORS 215.710, which describes land in a tract composed predominantly of soils that are irrigated and classified as prime, unique, Class I, or Class II or not irrigated and classified as prime, unique, Class I, or Class II.
- ORS 195.300(10)(c) relies on the land in the EFU zone being located within a place-of-use irrigation water right, an irrigation district, or a diking district.
- ORS 195.300(10)(f) relies on the land in the EFU zone being located within the boundaries of the Columbia Valley American Viticultural Area (AVA; see 27 Code of Federal Regulations Part 9, Subpart C - Approved American Viticultural Areas, Section 9.74 Columbia Valley) and meeting certain elevation (below 3,000 feet), slope (between zero and 15 percent), and aspect (between 67.5 and 292.5 degrees) criteria.

No portions of the Facility site boundary or micrositing area qualify as high-value farmland under the ORS 195.300(10)(a) and (f). Approximately 286 acres of land qualify as high-value farmland under ORS 195.300(10)(c). Applicability of each definition is outlined below.

ORS 195.300(10)(a)

The definition of high-value farmland under ORS 215.710 refers to land in a tract being predominately composed of soils that are irrigated and classified as prime, unique, Class I, or Class II or not irrigated and classified as prime, unique, Class I, or Class II. Per prior Oregon Department of Land Conservation and Development and Oregon Department of Energy (ODOE) precedent, if only a portion of the tract is irrigated (per the definition under OAR 660-033-0020(9)), then soils within the subject tracts shall be evaluated based on the following predominance test:

1. Identify NRCS irrigated soil capability class for "irrigated" portions of tract.
2. Identify NRCS non-irrigated soil capability class for non-irrigated portions of tract.
3. Sum all Class I, II, prime, and unique acres from steps 1 and 2.

4. Divide by total tract acres; if 50 percent or more are Class I, II, prime, and unique, then entire tract contains high-value farmland.

A predominance test per tract is provided in Table D-3 below. Based on the results of the predominance test, no tracts associated with the Solar Facility have 50 percent or more Class I, II, prime, and unique soils and meet the definition of high-value farmland under ORS 195.300(10)(a) and ORS 215.710.

Table D-3. Tract Analysis Predominance Test of High-Value Farmland Soils

Tract	Owner	Water Right	Total Tract Acreage	Acreage of High Value Soils (NRCS Soils Class 1, 2, Prime, or Unique)				Predominance Test Results
				Irrigated Acreage of Tract	Non-Irrigated Acreage of Tract	Total	Percent of Tract Area	
1	POWELL, PATRICK A TRUSTEE	-	1,352	0	354	354	26%	Not High-value Farmland
2	PINKERTON RANCH / PINKERTON RANCHES	-	1,718	0	529	529	31%	Not High-value Farmland
3	SODERLUND, CHRISTOPHER	-	475	0	115	115	24%	Not High-value Farmland
4	SODERLUND, CHRISTOPHER	-	160	0	17	17	10%	Not High-value Farmland
5	SIMPSON, NANCY J & RICHARD C	-	189	0	8	8	4%	Not High-value Farmland
6	CAMPBELL, STEPHEN FARM & CABIN TRUST	-	450	0	35	35	8%	Not High-value Farmland
7	BARNETT, LEE	-	638	0	64	64	10%	Not High-value Farmland
8	BLAGG, CARRIE L TRUSTEE	-	1,880	0	278	278	15%	Not High-value Farmland
9	ROLFE LAND & CATTLE CO LLC	-	1,861	0	374	374	20%	Not High-value Farmland
10	BUCK HOLLOW RANCH INC	Permit: G 16192 * IR Permit: G 16193 * IR	897	38	241	279	31%	Not High-value Farmland
11	EARL RANCH LLC	-	1,247	0	371	371	30%	Not High-value Farmland
12	BIRD, STEVEN & LINDA	Cert:34725 OR * IR	314	38	108	146	46%	Not High-value Farmland
13	JUSTESEN, FRED & JONNIE	-	636	0	197	197	31%	Not High-value Farmland
14	SALOMON, PAULINE TRUSTEE	-	303	0	1	1	0%	Not High-value Farmland

Tract	Owner	Water Right	Total Tract Acreage	Acreage of High Value Soils (NRCS Soils Class 1, 2, Prime, or Unique)				Predominance Test Results
				Irrigated Acreage of Tract	Non-Irrigated Acreage of Tract	Total	Percent of Tract Area	
15	JUSTESEN, FRED & JON / JUSTESEN, FRED & JONNIE / JUSTESEN, FRED A & JONNIE L	Cert:67579 OR * IR Cert:91248 CR * IR Permit: G 16239 * IR Permit: G 16238 * IR	4,274	87	687	773	18%	Not High-value Farmland
16	EARL RANCH LLC	-	949	0	34	34	4%	Not High-value Farmland
17	JUSTESEN, FRED / JUSTESEN, FRED & JON / JUSTESEN, FRED & JUSTESEN JON	-	636	0	23	23	4%	Not High-value Farmland
18	BERGE, JAMES C ETAL	-	911	0	89	89	10%	Not High-value Farmland
19	SALOMON, PAULINE TRUSTEE	Cert:26138 OR * IR Cert:97777 (RR) * IR	1,509	69	148	217	14%	Not High-value Farmland
20	RUGGLES, CATHERINE / RUGGLES, JESSE / RUGGLES, JESSE DEAN	-	1,876	0	75	75	4%	Not High-value Farmland
21	FINNEGAN RANCH LLC	-	798	0	44	44	5%	Not High-value Farmland
22	NOGLE, PAT / NOGLE, PAT & NOGLE, WHITNEY	-	1,415	0	93	93	7%	Not High-value Farmland
23	EARL RANCH LLC	-	1,187	0	36	36	3%	Not High-value Farmland
24	BOURBON ROAD RENEWABLES LLC	-	632	0	15	15	2%	Not High-value Farmland
25	OLESON PROPERTIES LLC	-	809	0	236	236	29%	Not High-value Farmland

ORS 195.300(10)(c)

As noted in Section 3.3.1, none of the land within the Facility site boundary or micrositing area is within an irrigation district or diking district. However, there are several place-of-use irrigation water rights within the site boundary totaling 286 acres. These acres meet the definition of high-value farmland under ORS 195.300(10)(c).

However, the Solar Facility will avoid permanent impacts to these acres, and therefore will not use, occupy, or cover any high-value farmland. There is a portion of one underground collector line associated with the Solar Facility, that would cross a sub-grade area subject to an irrigation water right (Permit G 91248 owned by Fred Justesen on Tract 15); however, this collector line will be installed via underground boring and no portion of this line will be located on the surface of this land or generate surface impacts during operation. Therefore, the line will have no permanent impacts to this high-value farmland and will not "use, occupy, or cover" such land.

ORS 195.300(10)(f)

As demonstrated on Figure D-9, no portion of the Facility site boundary is located within the Columbia Valley AVA.

Total High-Value Farmland in Solar Micrositing Area

As described in the paragraphs above, the site boundary contains 286 acres of high-value farmland per the definition under ORS 195.300(10)(c). However, the Solar Facility will avoid all permanent impacts to this high-value farmland and therefore will not use, occupy, or cover more than 12 acres of high-value farmland, thus it meets the requirements for siting a photovoltaic solar power generation facility under OAR 660-033-0130(38)(g).

3.3.2.2 Arable Lands

In accordance with OAR 660-033-0130(38)(a), 'arable land' means "land in a tract that is predominantly cultivated or, if not currently cultivated, predominantly comprised of arable soils." Per OAR 660-033-0130(38)(b), "'arable soils' means soils that are suitable for cultivation as determined by the governing body or its designate based on substantial evidence in the record of a local land use application, but 'arable soils' does not include high-value farmland soils described at ORS 195.300(10) unless otherwise stated." Therefore, for the purposes of identifying arable land under OAR 660-033-0130(38)(a), the Applicant calculated the composite footprint of cultivated land and acres of Class III and IV soils per the NRCS soil classification. Table D-4 shows that each tract in the Facility site boundary is predominantly composed of a combination of arable soils and/or cultivated land. Therefore, all of the land within each tract meets the definition of arable land.

Table D-4. Tract Analysis Predominance Test of Arable Land per OAR 660-033-0130(38)

Tract	Owner	Total Tract Acreage	Acreage of Arable Land				Predominance Test Results
			Cultivated Land	NRCS Soils Class III-IV	Total **	Percent of Tract Area	
1	POWELL, PATRICK A TRUSTEE	1,352	938	747	1,145	85%	Predominantly Arable
2	PINKERTON RANCH / PINKERTON RANCHES	1,718	1,061	1,101	1,640	95%	Predominantly Arable
3	SODERLUND, CHRISTOPHER	475	277	274	385	81%	Predominantly Arable
4	SODERLUND, CHRISTOPHER	160	43	144	159	100%	Predominantly Arable
5	SIMPSON, NANCY J & RICHARD C	189	0	182	182	96%	Predominantly Arable
6	CAMPBELL, STEPHEN FARM & CABIN TRUST	450	0	406	406	90%	Predominantly Arable
7	BARNETT, LEE	638	93	574	575	90%	Predominantly Arable
8	BLAGG, CARRIE L TRUSTEE	1,880	1,396	1,588	1,804	96%	Predominantly Arable
9	ROLFE LAND & CATTLE CO LLC	1,861	1,365	1,486	1,761	95%	Predominantly Arable
10	BUCK HOLLOW RANCH INC	897	489	632	858	96%	Predominantly Arable
11	EARL RANCH LLC	1,247	1,127	877	1,237	99%	Predominantly Arable
12	BIRD, STEVEN & LINDA	314	36	201	208	66%	Predominantly Arable
13	JUSTESEN, FRED & JONNIE	636	261	439	595	94%	Predominantly Arable
14	SALOMON, PAULINE TRUSTEE	303	0	302	302	100%	Predominantly Arable
15	JUSTESEN, FRED & JON / JUSTESEN, FRED & JONNIE / JUSTESEN, FRED A & JONNIE L	4,274	1,062	3,269	3,834	90%	Predominantly Arable
16	EARL RANCH LLC	949	643	913	935	99%	Predominantly Arable
17	JUSTESEN, FRED / JUSTESEN, FRED & JON / JUSTESEN, FRED & JUSTESEN JON	636	354	614	636	100%	Predominantly Arable

Tract	Owner	Total Tract Acreage	Acreage of Arable Land				Predominance Test Results
			Cultivated Land	NRCS Soils Class III-IV	Total **	Percent of Tract Area	
18	BERGE, JAMES C ETAL	911	0	817	817	90%	Predominantly Arable
19	SALOMON, PAULINE TRUSTEE	1,509	0	1,280	1,280	85%	Predominantly Arable
20	RUGGLES, CATHERINE / RUGGLES, JESSE / RUGGLES, JESSE DEAN	1,876	0	1,617	1,617	86%	Predominantly Arable
21	FINNEGAN RANCH LLC	798	272	746	776	97%	Predominantly Arable
22	NOGLE, PAT / NOGLE, PAT & NOGLE, WHITNEY	1,415	2	1,176	1,176	83%	Predominantly Arable
23	EARL RANCH LLC	1,187	681	1,148	1,169	98%	Predominantly Arable
24	BOURBON ROAD RENEWABLES LLC	632	431	617	632	100%	Predominantly Arable
25	OLESON PROPERTIES LLC	809	456	484	666	82%	Predominantly Arable

*Per OAR 660-033-0130(38)(b), "'arable soils' means soils that are suitable for cultivation as determined by the governing body or its designate based on substantial evidence in the record of a local land use application, but 'arable soils' does not include high-value farmland soils described at ORS 195.300(10) unless otherwise stated." Per the USDA Soil Conservation Service, NRCS Class I through IV soils are considered suitable for cultivation or arable soils while Class V and higher are considered non-arable soils (Helms 1992). As Class I and II soils are considered high-value farmland soils per ORS 195.300(10) and the definition of arable soils per OAR 660-033-0130(38)(b) excludes high-value farmland soils, the predominance test included only NRCS Class III and IV soils.

** "Total Acreage" calculations are a total of all cultivated lands plus acreage of any uncultivated land with NRCS Class III and IV soils. "Cultivated Land" is arable land regardless of the soil classification. Under the solar rules, if land is not cultivated, it is considered arable if it has Class III and IV soils.

3.3.2.3 Summary of Solar Facility High-Value Farmland and Arable Lands Analysis

The Solar Facility will not be located on high-value farmland per ORS 195.300(10)(a) and (f) and will avoid all permanent impacts to high-value farmland per ORS 195.300(10)(c). The entirety of the micrositing area (22,278 acres) consists of arable lands. The estimated permanent disturbance area of the Solar Facility is 8,043 acres. As a result, the Solar Facility will use, occupy, or cover more than 20 acres of arable lands and would not meet the requirements for siting a photovoltaic solar power generation facility under OAR 660-033-0130(38)(i). The Applicant therefore seeks a Goal 3 exception and provides evidence in Section 5.7 to demonstrate that a "Reasons" exception from Goal 3 is appropriate for the Solar Facility.

3.3.3 Wind Facility High-Value Farmland Soils and Arable Lands Analysis

In order to assess if a wind facility may be authorized within the EFU zone, the provisions under OAR 660-033-0130(37) concerning high-value farmland soils and arable lands must be complied with. Therefore, it is necessary to determine if there are high-value soils and arable lands in the site boundary that may be impacted by the Wind Facility. The following subsections provide this determination.

3.3.3.1 High-Value Farmland Soils

OAR 660-033-0130(37)(a) refers to "high-value farmland soils described at ORS 195.300(10)." ORS 195.300(10) provides multiple definitions of what is considered as "high-value farmland," but only ORS 195.300(10)(a) identifies soil classifications as part of the definition due to its inclusion of ORS 215.710 in the standard (see statute excerpts below).

ORS 195.300(10)

(a) High-value farmland as described in ORS 215.710 that is land in an exclusive farm use zone or a mixed farm and forest zone, except that the dates specified in ORS 215.710 (2), (4) and (6) are December 6, 2007.

. . . [omitted ORS 195.300(10)(b) through (f) as not applicable to high-value farmland soils definition]

ORS 215.710

(1) For purposes of ORS 215.705, high-value farmland is land in a tract composed predominantly of soils that, at the time the siting of a dwelling is approved for the tract, are:

(a) Irrigated and classified prime, unique, Class I or Class II; or

(b) Not irrigated and classified prime, unique, Class I or Class II.

> . . . [omitted ORS 215.705(10)(2) through (6) as not applicable to high-value farmland soils definition when located in Eastern Oregon]

In the absence of a specific definition of "high-value farmland soils" provided by ORS 195.300(10), the Applicant has inferred that "high-value farmland soils" are the soil classifications identified by ORS 215.710(1)(a) and (b), since these are the soils that may cause land in a tract to qualify as "high-value farmland."

In summary, the Applicant understands "high-value farmland soils described at ORS 195.300(10)" to mean irrigated or not irrigated and classified prime, unique, Class I or Class II under the NRCS soil classification system (NRCS 2026). As shown by Figure D-8, there are high-value farmland soils dispersed throughout the Facility site boundary and comprise 3,884 acres (or 16 percent) of the 23,936-acre Facility site boundary. The Wind Facility (including the wind and shared components) currently would cover a total of only 64 acres of high-value farmland soils based on the layout described in the Background Information Exhibit.

3.3.3.2 Arable Lands

Arable lands are defined differently depending on the proposed type of facility. Under OAR 660-033-0130(37)(b) (Oregon's administrative rules governing the siting of wind energy facilities on agricultural lands), arable lands are defined as "lands that are cultivated or suitable for cultivation including high-value farmland soils described at ORS 195.300(10)."

OAR 660-033-0130(37)(b) does not specify what qualifies as "lands suitable for cultivation." Therefore, the Applicant turns to the definition of "arable land" in OAR 660-033-0130(38) (Oregon's administrative rules governing the siting of solar photovoltaic power generation facilities on agricultural lands), which defines arable land as "predominantly cultivated, or if not cultivated, predominantly comprised of arable soils." NRCS soil capability classes I through IV are generally considered arable soils (Helms 1992), whereas NRCS soil classes V through VIII are generally considered nonarable soils (See OAR 660-033-0130[38][e]). Table D-5 provides the analysis determining arable and nonarable land per tract associated with the site boundary, accounting for cultivated land, high-value farmland, arable soils (Class I through IV soils) and nonarable soils (Class V through VIII). This table indicates that all of the tracts associated with the Wind Facility consist of arable land as defined by OAR 660-033-0130(37)(b).

Table D-5. Tract Analysis Predominance Test of Arable Land per OAR 660-033-0130(37)

Tract	Owner	Total Tract Acreage	Acreage			Percent of Tract Area	Predominance Test of Arable Land (Y/N)
			Cultivated Land	NRCS Soils Class I-IV	Total[1]		
1	POWELL, PATRICK A TRUSTEE	1,352	938	1,101	1,148	85%	Predominantly Arable
2	PINKERTON RANCH / PINKERTON RANCHES	1,718	1,061	1,629	1,654	96%	Predominantly Arable
3	SODERLUND, CHRISTOPHER	475	277	389	396	83%	Predominantly Arable
4	SODERLUND, CHRISTOPHER	160	43	160	160	100%	Predominantly Arable
5	SIMPSON, NANCY J & RICHARD C	189	0	189	189	100%	Predominantly Arable
6	CAMPBELL, STEPHEN FARM & CABIN TRUST	450	0	441	441	98%	Predominantly Arable
7	BARNETT, LEE	638	93	638	638	100%	Predominantly Arable
8	BLAGG, CARRIE L TRUSTEE	1,880	1,396	1,866	1,866	99%	Predominantly Arable
9	ROLFE LAND & CATTLE CO LLC	1,861	1,365	1,859	1,859	100%	Predominantly Arable
10	BUCK HOLLOW RANCH INC	897	489	895	895	100%	Predominantly Arable
11	EARL RANCH LLC	1,247	1,127	1,247	1,247	100%	Predominantly Arable
12	BIRD, STEVEN & LINDA	314	36	314	314	100%	Predominantly Arable
13	JUSTESEN, FRED & JONNIE	636	261	636	636	100%	Predominantly Arable
14	SALOMON, PAULINE TRUSTEE	303	0	303	303	100%	Predominantly Arable
15	JUSTESEN, FRED & JON / JUSTESEN, FRED & JONNIE / JUSTESEN, FRED A & JONNIE L	4,274	1,062	3,967	3,967	93%	Predominantly Arable
16	EARL RANCH LLC	949	643	947	947	100%	Predominantly Arable
17	JUSTESEN, FRED / JUSTESEN, FRED & JON / JUSTESEN, FRED & JUSTESEN JON	636	354	636	636	100%	Predominantly Arable

Tract	Owner	Total Tract Acreage	Acreage			Percent of Tract Area	Predominance Test of Arable Land (Y/N)
			Cultivated Land	NRCS Soils Class I-IV	Total[1]		
18	BERGE, JAMES C ETAL	911	0	906	906	100%	Predominantly Arable
19	SALOMON, PAULINE TRUSTEE	1,509	0	1,428	1,428	95%	Predominantly Arable
20	RUGGLES, CATHERINE / RUGGLES, JESSE / RUGGLES, JESSE DEAN	1,876	0	1,693	1,693	90%	Predominantly Arable
21	FINNEGAN RANCH LLC	798	272	790	790	99%	Predominantly Arable
22	NOGLE, PAT / NOGLE, PAT & NOGLE, WHITNEY	1,415	2	1,269	1,269	90%	Predominantly Arable
23	EARL RANCH LLC	1,187	681	1,184	1,184	100%	Predominantly Arable
24	BOURBON ROAD RENEWABLES LLC	632	431	632	632	100%	Predominantly Arable
25	OLESON PROPERTIES LLC	809	456	720	724	89%	Predominantly Arable

3.3.3.3 Summary of Wind Facility High-Value Farmland Soils and Arable Lands Analysis

In summary, there are high-value farmland soils in a dispersed pattern throughout the Facility site boundary and the entire Facility site boundary consists of arable lands. Section 5.5.2.2 provides an analysis of the Wind Facility's compliance with the provisions under OAR 660-033-0130(37).

3.4 Solar Facility Agricultural Impacts and Mitigation

3.4.1 State and Local Agricultural Overview

Sherman County is approximately 824 square miles in size with slightly more than three-quarters (76 percent) of the county in use as agricultural land (U.S. Census Bureau 2024, USDA 2022a). As described in the Agricultural Impact Analysis (Attachment D-1), agriculture is the dominant land use and a defining component of the economy in Sherman County. The county is specialized in dryland wheat production and contains some of the largest farm operations in the state. Cropland accounts for 64 percent of farmland within the county, while pastureland represents an additional 33 percent (see Attachment D-1). In 2022, Sherman County generated approximately $60.3 million in agricultural sales, representing roughly one percent of Oregon's total agricultural revenue of $6.8 billion (see Attachment D-1). Wheat dominates the county's agricultural economy, accounting for approximately $55.8 million, or 93 percent, of total agricultural sales (see Attachment D-1). The remaining agricultural sales are primarily associated with barley production and cattle and calf operations, which generated approximately $1.0 million and $2.6 million in sales, respectively (Attachment D-1).

As further discussed in Section 5.7, the Applicant is requesting an exception from Statewide Planning Goal 3 for an area of up to 8,500 acres of EFU land. The Applicant contracted ECOnorthwest to assess the economic impacts of removing land associated with the permanent footprint of the Solar Facility from agricultural production (see Agricultural Impact Analysis, Attachment D-1). ECOnorthwest used the preliminary design reflected in Figure 3.1 in the Background Information Exhibit to inform the analysis.

Using this design, ECOnorthwest estimated that approximately 4,659 acres of cultivated land in winter wheat production would be impacted by the Facility's limits of disturbance (i.e. total acres of cultivated land overlaid with the permanent disturbance area of the solar components, wind components, and shared components). As noted in Section 3.2, not all the acreage in the site boundary is actively cultivated in winter wheat. Portions of the site consist of CRP lands, grazing lands, or other non-cultivated areas not actively utilized for agriculture. Accordingly, the Agricultural Impact Analysis evaluates only the cultivated winter wheat acreage expected to be affected by the preliminary Facility layout because only these acres contribute to current agricultural production and the associated agricultural economic activity. The 4,659 acres of cultivated land analyzed by ECOnorthwest in the Agricultural Impact Analysis reflects the total acres of cultivated wheat impacted by the preliminary design described in this ASC, a design that has 8,048 total acres of permanent disturbance area for the full Facility, of which 8,043 acres are

associated with the permanent impacts of the Solar Facility (which includes solar components and shared components). The Applicant is requesting a Goal 3 exception for a slightly larger area than the total permanent disturbance area of the Solar Facility in the layout provided in the ASC (i.e. 8,500 acres) to accommodate final design refinements. However, the agricultural impact estimates presented in the ECOnorthwest Agricultural Impact Analysis (Attachment D-1) are based on the preliminary Facility layout and the associated estimate that approximately 4,659 acres of cultivated winter wheat would be affected. The assumptions used to estimate wheat production value and associated economic impacts, including crop yields, crop rotation, and production practices, are representative of cultivated winter wheat throughout the Facility site. As a result, the analytical approach remains applicable if the final Facility layout changes. The proposed Agricultural Investment Plan (see Section 3.4.3) is structured on a per-acre basis, and the final mitigation payment would be calculated using the actual acres of cultivated wheat permanently affected by the final approved Facility design prior to construction.

3.4.2 Solar Facility Agricultural Impacts

Agricultural production within the Facility site boundary primarily includes two-year rotation winter wheat production and cattle grazing. The assessment provided by the Agricultural Impact Analysis (Attachment D-1) and summarized herein provides a conservative estimate of the wheat operations' contributions to the local agricultural economy, using spending associated with the current operators' wheat production. In support of this ASC and the Agricultural Impact Analysis, the Applicant conducted a landowner survey of the properties within the site boundary. The survey was designed to collect information on existing agricultural activities and land management practices to inform the agricultural land use analysis. A summary of the landowner survey results is provided in Table D-6.

Based on the available survey information, only wheat production is expected to be directly affected by Facility operations. The Agricultural Impact Analysis (Attachment D-1) assessed the cattle grazing activities occurring in the Facility site boundary. The analysis concluded that while cattle grazing may be displaced from portions of the Facility site occupied by Facility infrastructure, grazing activities are expected to continue elsewhere within existing agricultural operations. Because cattle are mobile assets and grazing is expected to continue within the existing operations, the Facility is not anticipated to result in a measurable reduction in countywide livestock production or associated agricultural economic activity. Accordingly, the agricultural impact analysis does not identify material impacts to the local agricultural economy associated with livestock production.

Wheat yields for the operations in the site boundary are reported by the landowners to average 37.5 bushels per acre over the past 5 to 10 years. This reported yield is lower than the Sherman County 10-year normalized average of 51 bushels per acre, likely reflecting local precipitation patterns, soil conditions, topography, and other site-specific production factors. The reported yield is also consistent with the NRCS soil productivity estimates for dryland winter wheat within the Facility site, which average 36 bushels per acre (USDA NRCS Web Soil Survey, 2026).

The existing wheat production in the site boundary directly contributes a moderate amount of spending in the agricultural economy of Sherman County. To estimate the magnitude of the potential impact of converting approximately 4,659 acres of wheat to solar production on the local agricultural economy, the Agricultural Impact Analysis (Attachment D-1) estimated the wheat production value of the affected acres and then models the direct, indirect, and induced economic impacts of the wheat production lost from the conversion to the Solar Facility. This analysis relies upon publicly available data, published crop reports, regional trends, and local expert opinion.

The Agricultural Impact Analysis assumes that affected cultivated wheat acres would otherwise be cultivated for dryland winter wheat, with half of this total planted and harvested each year, while the other half left fallow. The analysis used the average reported yield of 37.5 bushels per acre to calculate the annual production. Using a price of $6.12 per bushel, estimated annual production value of winter wheat sales for the 4,659 acres of cultivated wheat land affected by the Solar Facility is estimated at $534,000.

Table D-6. Overview of Landowner Farmland Characteristics

Landowner	Crop Practices	Crop Schedule	Direct Jobs Currently Supported by Operators	Spending on Labor, Supplies and Services for Agricultural Operations (estimated reductions)	Range of Crop Yields Over the Past 5 to 10 Years	Plans for Land Outside of Micrositing Area During Facility Operation
POWELL PATRICK A TRUSTEE (Tract 1)	Dryland wheat farming. Crops are sold through the local commodity broker, and supplies are procured through local vendors.	Follows the same schedule as surrounding farmers.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.
PINKERTON RANCH(ES) (Tract 2)	Dryland wheat farming. No grazing or livestock farming. Crops are sold to Northwest Grain Growers, and supplies are procured through local vendors. Approximately 700 acres are in the conservation reserve program (CRP).	Follows the same schedule as surrounding farmers.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.
SODERLUND, CHRISTOPHER (Tract 3)	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.
SODERLUND, CHRISTOPHER (Tract 4)	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.
SIMPSON, NANCY J & RICHARD C (Tract 5)	Leased acres: 189.1; mostly in CRP. Farms elsewhere in Sherman County. No agricultural practices reported on leased lands.	N/A	None.	N/A	N/A	Will continue to farm on other agricultural land in Sherman County.
CAMPBELL, STEPHEN FARM & CABIN TRUST (Tract 6)	Leased acres: 137.9 acres; portion in CRP. No agricultural practices reported.	N/A	None.	N/A	N/A	Details not provided by landowner.
BARNETT, LEE (Tract 7)	Leased acres: 637 All land in CRP for over 20 years. No agricultural practices.	N/A	None.	N/A	N/A	Details not provided by landowner.

Landowner	Crop Practices	Crop Schedule	Direct Jobs Currently Supported by Operators	Spending on Labor, Supplies and Services for Agricultural Operations (estimated reductions)	Range of Crop Yields Over the Past 5 to 10 Years	Plans for Land Outside of Micrositing Area During Facility Operation
BLAGG, CARRIE L TRUSTEE (Tract 8)	Leased acres: 1,876 1,600 acres in winter wheat across all landowner's parcels; also farm neighboring properties. Wheat sold to Northwest Grain Growers.	2-year rotation (40 bushels per acre every other year because of 2-year crop cycle rotation) Seed – mid September to mid October with chemicals depending on conditions Winter – not much happens April-June start of summer fallow, glyphosate application on fallow ground, then crop spraying with broadleaf application then grassy wheat application as needed June – another glyphosate application with another chemical like dychamba July-August – harvest Summer fallow and more glyphosate September seeding	1 owner-operator and some harvest help	Seed is purchased from Northwest Grain Growers, chemicals and fertilizers are purchased from McGregor, and equipment is purchased from Morrow County Grain Growers.	40 bushels/acre annual average yield	Will continue to farm areas outside of site features to the extent economically feasible.
ROLFE LAND & CATTLE CO LLC (Tract 9)	Leased acres: 1,860 1,351 acres are in wheat production. 366 acres is grass cattle pasture in Rosebush Canyon. 148 acres is scab ground interspersed in wheat fields. Landowner is a registered angus producer and sells cows for breeding stock. Grain is sold to Mid Columbia Producers or Northwest Grain Growers. Livestock sold at auction yard or to private buyers. All the 1,351 cropland acres are leased to Fred Rolfe. Additional grazing pasture is leased to Fred Rolfe and Tom Rolfe.	March-September: tilling April-May: spraying July-August: harvest August: fertilize September-October: seeding	1 owner-operator and hired labor	Most expenditures are local. Seed is bought from Mid Columbia Producers, fertilizer and chemicals are bought from McGregor, repairs are done at Morrow County Grain Growers, and equipment is from RDO Equipment Co. Estimated reductions: seed, fertilizers, and repairs would be drastically reduced. No impact on labor.	35-40 bushels/acre annual average yield	Will continue agricultural operations on lands available after construction based on land suitability and economic viability.

Landowner	Crop Practices	Crop Schedule	Direct Jobs Currently Supported by Operators	Spending on Labor, Supplies and Services for Agricultural Operations (estimated reductions)	Range of Crop Yields Over the Past 5 to 10 Years	Plans for Land Outside of Micrositing Area During Facility Operation
BUCK HOLLOW RANCH INC (Tract 10)	Leased acres: 890.05 479 acres are in wheat production. There is no livestock use in crop production area. 240 acres are in the CRP. 171 acres of rangeland with cow/calf operations. Two existing place-of-use water rights occur on this tract (Permit G 16192 and Permit G 16193); however, according to the landowner there are no cultivated lands in irrigation, and the leased properties have no water rights. Wheat sold to Northwest Grain Growers. Livestock sold to Norton Cattle Co. and Central Oregon Livestock Auction.	Landowner stated that schedule is similar to the example given in the landowner survey (2-year wheat rotation).	3 (1 owner operator, 2 laborers)	$250/acre for wheat production	45 bushels/acre annual average yield	Will continue to farm. Anticipates some loss of production of wheat from conversion of wheat lands to solar; no impact to cattle operations from the Facility. Plans to keep farming outside the Facility footprint and will use revenues to improve operations on remaining land still in production.
EARL RANCH LLC (Tract 11)	Leased acres: 1,253.31 18 acres in CRP for 39 years at $45/acre. 737 acres wheat / summer fallow rotation. Wheat sold to Northwest Grain Growers.	Mid-September to mid-October: seeding and spraying Winter: some maintenance depending on weather March, April, May: First pass on Chem-fallow, glyphosate application on fallow ground. This is followed by application of herbicide and fungicide on crops. May-June: vertical tilling June-July: herbicide application Late July-mid August: harvest and picking rocks in fallow fields to be seeded in the fall September-October: start cycle again with seeding and spraying	4 (all owner/operators)	Seed: $18/acre Chemicals and Fertilizers: $15-25/acre Vertical Tillage: $10/acre Fuel: $2,500 per year Estimated reductions: increased spending on labor due to increase in funds. Decrease in spending on crops by 1/2 to 2/3. Equipment and repair costs will stay the same or increase to upgrade to newer equipment. No change to suppliers.	20-40 bushels/acre annual average yield, depending on rainfall	Will continue to farm. Anticipate having a total of nearly 600 acres that will continue being farmed. Anticipate increasing their spending on labor as they will be able to use Facility leases to finance overdue farm projects that they previously did not have the funds to do and didn't want to take on debt. Among these projects are building a new shop, refurbishing buildings, drilling a new well for domestic use. Spending on crop inputs will decrease proportional to acres of farming reduced. Expenditures on equipment and repairs will remain the same or possibly increase as they will be able to afford to upgrade to newer equipment. They will continue to use all the same suppliers. The lease income could also support them in experimenting with other crops (i.e. barley, dry peas, lentils, oil seeds, etc.) that they previously couldn't justify the risk to bankers over the traditional wheat/fallow rotation. Does not currently foresee any impacts on ability to farm and notes that operative farm bill appropriately protects farmers from potential liability associated with energy facility interaction.

Landowner	Crop Practices	Crop Schedule	Direct Jobs Currently Supported by Operators	Spending on Labor, Supplies and Services for Agricultural Operations (estimated reductions)	Range of Crop Yields Over the Past 5 to 10 Years	Plans for Land Outside of Micrositing Area During Facility Operation
BIRD, STEVEN & LINDA (Tract 12)	Leased acres: 314 265.64 acres in CRP until 2033 at $53.09-$53.71/acre. 33 acres in irrigated hay and barley production (Cert: 34725). Crops sold to Pat Bird in Wasco. Does not expect the Facility to impact crops. No livestock farming.	Details not provided by landowner.	None	Details not provided by landowner.	Historically (prior to CRP) land in wheat averaged 35-40 bushels/acre annually	Small area of irrigated hay/barley will be avoided by the Facility and could continue to be farmed.
JUSTESEN, FRED & JONNIE (Tract 13)	Leased acres: 629 304.22 acres in the CRP for over 30 years, at $45/acre. 260 acres dryland wheat farming with no grazing. Cow/calf operations on rangeland. Wheat sold to Northwest Grain Growers. Livestock sold to Norton Cattle Co. and Central Oregon Livestock Auction.	Landowner stated that schedule is similar to the example given in the landowner survey (2-year wheat rotation).	3 (1 owner/ operator, 2 laborers)	$250/acre for wheat production	45 bushels/acre annual average yield	Will continue to farm. Plans to keep farming lands outside the Facility footprint: will use revenue to improve operations on remaining land still in production.
SALOMON, PAULINE TRUSTEE (Tract 14)	Acres: 302.15 259.64 acres in the CRP for 15 years, at $49.55/acre, expiring September 2026. No farming practices. Land designated highly erodible lands.	N/A	1 (owner/operator)	N/A	N/A	Details not provided by landowner.
JUSTESEN, FRED & JON / JUSTESEN, FRED & JONNIE / JUSTESEN, FRED A & JONNIE L (Tract 15)	Acres: 4,259.14 2,060.3 acres in the CRP for over 30 years, at $45/acre. 1,018 acres dryland wheat farming with no grazing. Four existing place-of-use water rights occur on this tract (Cert 67579, Permit G 16238; Permit G 16239, and Cert 91248); however, according to the landowner there are no cultivated lands in irrigation, and the leased properties have no water rights. Cow/calf operations on rangeland. Wheat sold to Northwest Grain Growers. Livestock sold to Norton Cattle Co. and Central Oregon Livestock Auction.	Landowner stated that schedule is similar to the example given in the landowner survey (2-year wheat rotation).	6 (2 owner/ operators, 4 laborers)	$250/acre for wheat production	45 bushels/acre annual average yield	Will continue to farm. Plans to keep farming lands outside the Facility footprint area: will use revenue to improve operations on remaining land still in production.
EARL RANCH LLC (Tract 16)	Acres: 941.2 662 acres wheat / summer fallow rotation. Wheat sold to Northwest Grain Growers.	See responses from Tract 11.	See responses from Tract 11.	See responses from Tract 11.	See responses from Tract 11.	See responses from Tract 11.

Landowner	Crop Practices	Crop Schedule	Direct Jobs Currently Supported by Operators	Spending on Labor, Supplies and Services for Agricultural Operations (estimated reductions)	Range of Crop Yields Over the Past 5 to 10 Years	Plans for Land Outside of Micrositing Area During Facility Operation
JUSTESEN, FRED / JUSTESEN, FRED & JON / JUSTESEN, FRED & JUSTESEN JON (Tract 17)	Acres: 631.03 47 acres in the CRP for over 30 years, at $45/acre. 338 acres dryland wheat farming with no grazing. Cow/calf operations on rangeland. Wheat sold to Northwest Grain Growers. Livestock sold to Norton Cattle Co. and Central Oregon Livestock Auction.	Landowner stated that schedule is similar to the example given in the landowner survey (2-year wheat rotation).	3 (1 owner/ operator, 2 laborers)	$250/acre for wheat production	45 bushels/acre annual average yield	Will continue to farm. Plans to keep farming lands outside Facility footprint area: will use revenue to improve operations on remaining land still in production.
BERGE, JAMES C ETAL (Tract 18)	Acres: 2,840 263.52 acres in CRP at $13,572/year for 15 years. 623.08 acres in conservation reserve program at $8,100/year for 15 years. No crop production. Cattle grazing April through November. Calves are sold at auction in Madras, OR or to Norton Cattle Company in Madras, OR.	N/A	1 (owner/operator)	Details not provided by landowner.	N/A	Will continue to farm. Will move cattle to acres not used by the Facility.
SALOMON, PAULINE TRUSTEE (Tract 19)	Acres: 1505.75 835.04 acres in the CRP for 15 years, at $49.81/acre, expiring September 2026. Two water rights exist on tract: Cert 26138 OR and Cert 9777 (RR). However, per landowner, these water rights are associated with the reservoir on the tract and land previously irrigated was committed to the CRP and therefore no irrigation is occurring on site. No farming practices. Land designated highly erodible lands.	N/A	2 (Judy Justesen, owner; Paula Salomon, owner/operator)	N/A	N/A	Details not provided by landowner.
RUGGLES, CATHERINE / RUGGLES, JESSE / RUGGLES, JESSE DEAN (Tract 20)	Acres: 1,146 No acres farmed directly. 320.9 acres in CRP. Land leased to the Justesens for summer cattle grazing and recreational use (hunting, riding, etc.).	N/A	None	Details not provided by landowner.	N/A	Will continue to lease land to Justesens for pasture.
FINNEGAN RANCH LLC (Tract 21)	Approximately 300 acres of winter wheat (was in CRP up until 2025). Rangeland for raising quarter horses.	Similar cycle to what was provided by Bourbon Road Renewables (Tract 25).	None	Estimated spending amounts not provided by landowner. Estimated reductions: No intent to reduce current spending, anticipating an increase in spending if agrivoltaics are planted. Maintain spending for rearing of quarter horses.	35 bushels/acre annual average yield	Will continue to raise horses outside of leased area.

Landowner	Crop Practices	Crop Schedule	Direct Jobs Currently Supported by Operators	Spending on Labor, Supplies and Services for Agricultural Operations (estimated reductions)	Range of Crop Yields Over the Past 5 to 10 Years	Plans for Land Outside of Micrositing Area During Facility Operation
NOGLE, PAT & NOGLE, WHITNEY (Tract 22)	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.
EARL RANCH LLC (Tract 23)	Acres: 1,189.87 35 acres in CRP for 39 years at $45/acre. 685 acres wheat / summer fallow rotation. Wheat sold to Northwest Grain Growers.	See responses from Tract 11.	See responses from Tract 11.	See responses from Tract 11.	See responses from Tract 11.	See responses from Tract 11.
BOURBON ROAD RENEWABLES LLC (Tract 24)	Acres: 631.8 acres Approximately 50 acres in CRP for 39 years at $45/acre. 432 acres of cropland with wheat/fallow 2-year rotation. Wheat sold to Northwest Grain Growers.	See responses from Tract 11.	See responses from Tract 11.	See responses from Tract 11.	See responses from Tract 11.	See responses from Tract 11.
OLSEN PROPERTIES LLC (Tract 25)	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.	Details not provided by landowner.

The Agricultural Impact Analysis (Attachment D-1) modeled the wheat production in the affected acres to estimate the direct, indirect, and induced economic impact of the current agricultural activities within the affected acres; see Table D-7. The direct impact represents the gross value of production that the farmers would no longer receive from producing wheat (i.e., $534,000 annually), and the associated employment and labor income of farmers and their employees (Table D-7). Taking the affected area out of agricultural production would not only have direct impacts, but it will also have indirect impacts to the local agricultural economy due to the associated reduction in local spending (i.e., indirect impacts or "supply chain" impacts). Because participating landowners are expected to receive long-term Facility lease payments that replace or exceed foregone crop revenue, the indirect impacts most closely reflect annual economic activity in the agricultural sector of Sherman County supported by the operations' wheat production, which would be lost to the agricultural economy of Sherman County when the Facility is built. The estimated induced impacts presented in Table D-7 are supported by the spending of households associated either directly or indirectly with the existing agricultural operations.

Table D-7. Economic Contributions of Wheat Acres Impacted by Facility Operations

Impact	Employment (FTE)[1]	Labor Income ($000)	Output ($000)
Direct	0.5	$19,000	$534,000
Indirect	1.8	$116,000	$232,000
Induced	0.2	$8,000	$29,000
Total	**2.5**	**$143,000**	**$795,000**

Notes:
1. Jobs are full-time equivalents (FTE) for a period of one year. Direct employment includes both operator and hired labor. Since operation specific labor distribution between operator and hired labor and across wheat production activities were unavailable, all direct employment was modeled based on published crop budgets as hired full-time employment.
Source: IMPLAN 2026

For direct impacts, the landowner/farmer will experience the loss of direct agricultural production revenue, but this lost revenue will be replaced by revenue received by Solar Facility lease payments. As the revenue received from the Solar Facility is substantially greater in value than the agricultural production revenue, direct impacts will be more than fully mitigated. Regarding the 0.5 FTE direct job shown in Table D-7, this was estimated by IMPLAN based on published crop budgets and is a conservative estimate. Survey responses from the affected landowner/farmer summarized in Table D-6 indicate that many of the affected farmers would continue to farm on land not affected by the Facility's final footprint and/or elsewhere in the county, which would reduce the need to downsize staffing.

Indirect impacts represent a decrease in economic activity supported by the agricultural production of land within the affected wheat acres. Because the wheat operations purchase some of their inputs within Sherman County, it supports additional economic activity through spending on items such as fuel, fertilizer, seed, and equipment. Crop production within the affected acres

supports 1.8 FTE indirect jobs associated with $116,000 in labor income. The estimated indirect economic output is $232,000 annually.

Induced impacts are generated by the spending of households associated either directly or indirectly with ongoing agricultural operations within the affected acres. Assuming this income is no longer earned, it is not available to spend and would also represent lost economic activity when agricultural production on site stops. However, due to lease payments or other compensation to landowners by the Solar Facility, minimal changes in landowner household income and spending are expected due to the Solar Facility. Spending by indirectly associated households (such as the households of agricultural vendor employees) could be reduced, but the associated impacts would be to the economy in general and not to the agricultural economy.

3.4.3 Solar Facility Agricultural Mitigation

The Facility will provide economic benefits to Sherman County through Facility-related spending as described further below. However, in acknowledgement of the decreased agricultural-related economic activity resulting from construction of the Solar Facility (as described above), the Applicant has developed an Agricultural Investment Plan (see Attachment D-3) to support the local agricultural economy (Section 3.4.3.2).

3.4.3.1 Rural Economic Benefits to Sherman County

The Applicant contracted ECOnorthwest to evaluate how Facility-related spending would support employment, labor income, and economic output within the local area economy, defined as Sherman, Wasco, Hood River, and Klickitat (WA) counties (see Economic Impact Analysis, Attachment D-2). The Economic Impact Analysis found that construction-related spending by the Facility within the local area economy is estimated to support substantial secondary economic activity. Over the construction period, local expenditures are estimated to support:

- Approximately 1,899 total annual jobs, including direct, indirect, and induced employment.
- Approximately $369.41 million in labor income over the full construction period.
- Approximately $3.43 billion in total economic output, of which roughly $1.46 billion is expected to occur within the local area economy.

The estimated output multiplier for construction is 1.15, indicating that for every dollar of direct construction spending, an additional $0.15 in economic output is supported within the local area economy. These impacts represent one-time economic activity associated with Facility development.

Following construction, the Applicant anticipates operating the Facility for approximately 30 years beginning in 2030. During operations, the Facility would support economic activity through direct employment, ongoing operations and maintenance expenditures, and lease payments to participating landowners. Facility operations are expected to directly employ approximately 20 full-time workers residing within the local area, with aggregate wages and benefits estimated at approximately $2.2 million annually. Total annual operations-related expenditures are estimated at

$36.9 million, including maintenance, administration, insurance, replacement parts, and other operating costs. Annual operations-related spending is estimated to support:

- Approximately 100 total jobs, including direct, indirect, and induced employment.
- Approximately $6.9 million in total labor income annually.
- Approximately $15.5 million in secondary economic output within the local area economy.

The estimated output multiplier for operations is 1.42, reflecting the ongoing circulation of operations-related spending within the local area economy. While operations-related impacts are smaller in magnitude than construction impacts, they represent stable, recurring economic contributions over the long term.

When viewed in the context of the local area economy's total employment (35,608 jobs) and output ($9.2 billion), annual construction-phase local impacts represent approximately 3 to 6 percent of local area employment and output during the construction period, and reflect the large scale of the Facility and the concentration of economic activity over the course of construction.

Operations-related impacts represent a smaller share of the local economy, approximately 0.3 percent of employment and 0.4 percent of output, but provide sustained economic contributions over the Facility's operating life. These ongoing impacts contribute to long-term economic stability through continued employment, business activity, and income generation.

Overall, the Facility is expected to generate substantial short-term economic activity during construction and provide sustained, long-term economic contributions during operations, supporting employment, labor income, and business activity within the broader local and regional economy.

3.4.3.2 Agricultural Investment and Mitigation

As noted in the ODOE memorandum dated November 27, 2024, regarding Goal 3 Exceptions, a Goal 3 exception may be justified when an applicant demonstrates that the local agricultural economy will benefit as a result of conversion of the use from agriculture to an energy facility over the life of the proposed facility (ODOE 2024). In Section 3.4.3.1, the Applicant outlines how the Solar Facility will bring rural local economic benefit to Sherman County by creating jobs as well as direct and indirect local economic benefits during construction and operation, and adding to the local tax base, which directly benefits the agricultural community.

In acknowledgement of the decreased agricultural related economic activity resulting from construction of the Solar Facility as quantified through the calculation of annual indirect impacts modeled in IMPLAN and discussed in Section 3.4.2 and Attachment D-1, the Applicant has developed an Agricultural Investment Plan (see Attachment D-3). This plan will support the long-term vitality of Sherman County's agricultural economy through meaningful investments benefiting Sherman County agricultural stakeholders and the larger rural economy through strategic resource investments in the local agricultural economy. The Applicant will contribute $976 per acre into the

mitigation fund for each acre the Solar Facility removes from agricultural production[6]. The Applicant will partner with Sherman County and Mid-Columbia Economic Development District (MCEDD) to establish an agricultural mitigation fund that will administer and distribute dollars for projects having a benefit to the Sherman County agricultural economy. The fund will ensure that any potential adverse impacts from the Solar Facility are offset to a level acceptable to Sherman County and the community. As described in the Agricultural Investment Plan (Attachment D-3), MCEDD would administer the Speedway Agricultural Investment Fund and would form and oversee a six-person advisory committee (Selection Committee) to review applications for funding and make recommendations to Sherman County Board of Commissioners (BOC)/County Court on funding projects. The Agricultural Investment Plan describes the selection criteria for each of the six members and proposed projects to be funded. Sherman County will have the ability to propose candidates for the Selection Committee in accordance with the criteria in the investment plan. The final decision on what agricultural-related projects and/or what organizations would be awarded funds will be determined by the Sherman County BOC/County Court. More details regarding the Agricultural Investment Plan are included in Attachment D-3 and Section 5.7.1.2.

4.0 Compliance with Statewide Planning Goals – OAR 345-022-0030(7)(a)

(7) To assist the Council in determining whether the standard outlined in (1) through (6) has been met, the Applicant must submit:

(a) Information about the proposed facility's compliance with the statewide planning goals adopted by the Land Conservation and Development Commission, providing evidence to support a finding by the Council as required by OAR 345-022-0030.

The Applicant provides information about the Facility's compliance with Oregon's Statewide Land Use Planning Goals in the findings to the applicable standards of the Sherman County Zoning Ordinance (SCZO), Sherman County Comprehensive Plan (SCCP), and directly applicable rules and statues. In situations where an exception to a statewide planning goal is required, the Applicant must do so pursuant to the requirements of ORS 469.504(2) and OAR 345-022-0030(4)(c).

Based on the discussion in Section 3.3.2.3, the Solar Facility will occupy more than 20 acres of arable land. OAR 660-033-0130(38)(k) states that the footprint of a photovoltaic solar power generation facility may only exceed 20 acres of arable land if an exception is taken pursuant to ORS 197.732 and OAR Chapter 660, Division 4. As the Facility is located within the EFU zone, the "applicable statewide planning goal" is Goal 3, which is the State's Agricultural Lands goal. Thus, the Facility requires an exception to Statewide Planning Goal 3 pursuant to ORS 469.504(2) and OAR 345-022-0030(4). The justification for an exception to Statewide Planning Goal 3 is set forth in Section 5.7 below.

[6] Calculated over a period of 30 years of operation, and adjusting for inflation, the estimated indirect output would be $4,547,302 or $976 per acre of farmland taken out of production.

4.1 Land Use Process – OAR 345-022-0030(7)(b)

(b) The applicant must state whether the applicant elects to address the Council's land use standard by obtaining local land use approvals under ORS 469.504(1)(a) or by obtaining a Council determination under ORS 469.504(1)(b). An applicant may elect different processes for an energy facility and a related or supporting facility but may not otherwise combine the two processes. Once the applicant has made an election, the applicant may not amend the application to make a different election. In this subsection, "affected local government" means a local government that has land use jurisdiction over any part of the proposed site of the facility. In the application, the applicant must:

The Applicant has elected to address the Council's land use standard by obtaining a land use determination from the Council.

4.2 Map of the Analysis Area – OAR 345-022-0030(7)(b)(A)

(A) Include a map showing the comprehensive plan designations and land use zones in the analysis area;

Figure D-2 shows the Sherman County comprehensive plan designations and land use zones in the analysis area.

4.3 Local Land Use Approvals – OAR 345-022-0030(7)(b)(B)

(B) If the applicant elects to obtain local land use approvals:

(i) Identify the affected local governments from which land use approvals will be sought;

(ii) Describe the land use approvals required in order to satisfy the Council's land use standard;

(iii) Describe the status of the applicant's application for each land use approval; and

(iv) Provide an estimate of time for issuance of local land use approvals.

The Applicant has elected to address the Council's land use standard by obtaining a land use determination from the Council pursuant to ORS 469.504(1)(b). Therefore, these standards do not apply.

5.0 EFSC Determination on Land Use – OAR 345-022-0030(7)(b)(C)

(C) If the applicant elects to obtain a Council determination on land use:

(i) Identify the affected local governments;

(ii) Identify the applicable substantive criteria from the affected local government's acknowledged comprehensive plan and land use regulations that are required by the

statewide planning goals and that are in effect on the date the application is submitted and describe how the proposed facility complies with those criteria;

(iii) Identify all Land Conservation and Development Commission administrative rules, statewide planning goals and land use statutes directly applicable to the facility under ORS 197.646(3) and describe how the proposed facility complies with those rules, goals and statutes;

(iv) If the proposed facility might not comply with all applicable substantive criteria, identify the applicable statewide planning goals and describe how the proposed facility complies with those goals; and

(v) If the proposed facility might not comply with all applicable substantive criteria or applicable statewide planning goals, describe why an exception to any applicable statewide planning goal is justified, providing evidence to support all findings by the Council required under ORS 469.504(2).

Compliance with OAR 345-022-0030(7)(b)(C)(i) and (ii) is discussed in Sections 5.1 to 5.4. Compliance with OAR 345-022-0030(7)(b)(C)(iii) is addressed in Section 5.5. Compliance with OAR 345-022-0030(7)(b)(C)(iv) is addressed in Section 5.6. Compliance with OAR 345-022-0030(7)(b)(C)(v) is addressed in Section 5.7.

5.1 Identification of Applicable Substantive Criteria – OAR 345-022-0030(7)(b)(C)(i) and (ii)

(C) If the applicant elects to obtain a Council determination on land use:

(i) Identify the affected local governments;

(ii) Identify the applicable substantive criteria from the affected local government's acknowledged comprehensive plan and land use regulations that are required by the statewide planning goals and that are in effect on the date the application is submitted and describe how the proposed facility complies with those criteria;

The Facility will be located entirely within the EFU (F-1) zone of Sherman County. Therefore, Sherman County (County) is the affected local government. Applicable Sherman County substantive criteria are summarized in Table D-8 below and confirmed by the County (Attachment D-4). Section 5.2 addresses applicable provisions of the SCZO (County 2017a), Section 5.3 addresses applicable provisions of the Sherman County 2007 Wind Power Ordinance (County 2007), and Section 5.4 addresses applicable provisions of the SCCP (County 2017b).

Table D-8. Sherman County Applicable Substantive Criteria

Sherman County Zoning Ordinance (SCZO)	
Article 3 – Use Zones	
SCZO Section 3.1	Exclusive Farm Use, F-1 Zone
2. Uses Permitted	
(v) Utility Facility services lines as set forth in ORS 215.283(1)(x)	
3. Conditional Uses Permitted	
(q) Commercial Utility Facilities	
(z) Construction, reconstruction, or widening of highways, roads, bridges or other transportation projects that are in the Sherman County Transportation system plan.	
4. Dimensional Standards	
SCZO Section 3.6	Significant Resources Combining Zone (SR)
SCZO Section 3.7	Natural Hazards Combining Zone (NH)
Article 4 – Supplementary Provisions	
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5.2 Compliance with Sherman County Zoning Ordinance

5.2.1 SCZO Article 3 – Use Zones

5.2.1.1 SCZO Section 3.1 Exclusive Farm Use, F-1 Zone

In an F-l Zone, the following regulations shall apply:

2. Uses Permitted – In the F-l Zone, the following uses and their accessory uses are permitted:

(v) Utility Facility services lines as set forth in ORS 215.283 (1) (x).

Response: This response has two parts, each outlining how and why the Applicant proposes to apply ORS 215.283(1) to the Facility's 500-kV gen-tie transmission line and the aboveground 230-kV collector lines.

500-kV Gen-tie Transmission Line

The 500-kV gen-tie transmission line does not constitute a "wind power generation facility" per OAR 660-033-0130(37), or a "photovoltaic solar power generation facility" per OAR 660-033-0130(38), and therefore is not addressed below in Sections 5.5.2.2 or 5.5.2.3, respectively. As defined above in Section 3.1, the 500-kV gen-tie transmission line is an associated transmission line (per ORS 469.300), supported by transmission structures less than 200 feet in height, that connects the central substation to the new BPA switchyard (to be located adjacent to the existing BPA 500-kV Ashe-Marion Transmission Line). It will directly connect the Facility to the regional electric grid.

The 500-kV gen-tie transmission line does not fall within the administrative uses listed in SCZO 3.1.2 or the conditional uses listed in SCZO 3.1.3. Gen-tie lines typically fall within the use category of *utility facilities necessary for public service*, per ORS 215.283(1)(c). In summary, the 500-kV gen-tie transmission line does not fall within the current list of uses permitted provided by SCZO 3.1.2 or 3.1.3, despite the use being listed under ORS 215.283(1) as permitted subject to the required standards. Therefore, the Applicant proposes to directly apply ORS 215.283(1)(c):

> *ORS 215.283(1)(c)*
>
> *Utility facilities necessary for public service, including wetland waste treatment systems but not including commercial facilities for the purpose of generating electrical power for public use by sale or transmission towers over 200 feet in height. A utility facility necessary for public service may be established as provided in:*
>
> *(A) ORS 215.275; or*
>
> *(B) If the utility facility is an associated transmission line, as defined in ORS 215.274 and 469.300.*

As discussed above and in Section 3.1, the transmission support structures will not exceed 200 feet in height; therefore, the 500-kV gen-tie transmission line falls within the ORS 215.283(1)(c) threshold. The 500-kV gen-tie transmission line may be established pursuant to ORS 215.283(1)(c)(B) because it falls within the definition of "associated transmission lines" pursuant

to ORS 469.300 and 215.274. The applicable standards of ORS 215.274 are addressed in Section 5.5.1.1 below. Therefore, the 500-kV gen-tie transmission line falls within the "utility facility necessary for public service" use category provided by ORS 215.283(1)(c)(B).

Aboveground 230-kV collector line

As defined above in Section 3.1.1, the aboveground 230-kV collector lines are a portion of the collector system, supported by pole structures up to 135-feet tall, that connect the six collector substations to the central substation. The collector lines will not directly connect the Facility to the regional electric grid.

According to past site certificate orders, the Oregon Energy Facility Siting Council (EFSC) has classified high-voltage 230-kV aboveground collector lines with transmission structures less than 200 feet high that connect internal Facility substations and do not directly connect a Facility to the regional electric grid, and that are substantively similar to the Facility's aboveground 230-kV collector lines (as defined above in Section 3.1), as "utility facilities necessary for public service" because the internal transmission structures and lines are indistinguishable from interconnection or other types of transmission towers or lines.[7] Therefore, the Applicant also proposes to directly apply ORS 215.283(1)(c) to the aboveground 230-kV collector lines [ORS language provided above].

As discussed above and in Section 3.1.1, the transmission support structures will not exceed 200 feet in height; therefore, the aboveground 230-kV collector lines fall within the ORS 215.283(1)(c) threshold. The aboveground 230-kV collector lines may be established pursuant to ORS 215.283(1)(c)(A) because, for the reasons outline above in this subsection, it is considered a "utility facility necessary for public service," but does not fall within the definition of "associated transmission lines" pursuant to ORS 469.300 and 215.274. The applicable standards of ORS 215.275 are addressed in Section 5.5.1.2 below.

> *SCZO 3.1.3. Conditional Uses Permitted - In an F-l Zone, the following uses and their accessory uses are permitted when authorized in accordance with the requirements of Article 5 of this Ordinance and this Section:*
>
> *(q) Commercial utility facilities.*
>
> *(z) Construction, reconstruction, or widening of highways, roads, bridges or other transportation projects that are in the Sherman County Transportation system plan.*

Response: The majority of the Facility meets the definition of "utility facility" under SCZO 1.4.136[8], and is considered commercial as the Applicant proposes to generate power for sale. All Facility components and associated infrastructure fall under the definition of "commercial utility facility," except for the 500-kV gen-tie transmission line and aboveground 230-kV collector lines, which are

[7] Final Order on the ASC for the Nolin Hills Wind Power Project, July 2023, p. 80

[8] SCZO 1.4.136. Utility Facility - *Any major structure owned or operated by a public, private or cooperative electric, fuel, communication, sewage or water company for the generation, transmission, distribution or processing of its products or for the disposal of cooling water, waste or by-products, but excluding local sewer, water, gas, telephone and power distribution lines, and similar minor facilities.*

addressed below under ORS 215.274 in Section 5.5.1.1 and ORS 215.275 in Section 5.5.1.2, respectively.

Construction of the Facility may require improvements to county roads involving road widening and/or improving the surface condition. Therefore, the Applicant assumes the potential improvements would include roads within the Sherman County Transportation System Plan, and the SCZO 3.1.3(z) use category applies.

The Facility's compliance with the SCZO Article 5 Conditional Uses is demonstrated below, in Section 5.2.3.

(x) Transmission Lines over 200 Feet in Height

The aboveground 230-kV collector lines and 500-kV gen-tie transmission line are the only Facility components that will require transmission support structures. As discussed above and defined in Section 3.1, no transmission support structures will exceed 200 feet in height. Therefore, this use category does not apply to the Facility.

SCZO 3.1.4. Dimensional Standards - In an F-1 (EFU) Zone, the following dimensional standards shall apply:

(a) New farm parcels shall be a minimum of 80 acres.

(b) MINIMUM LOT SIZE-NON-FARM PARCELS. Non-farm parcels allowed pursuant to the provisions of this Ordinance and more specifically this Section, shall meet the following standards:

1) Shall be of adequate size and dimensions to meet applicable setback requirements.

2) Shall be of the minimum size necessary to accommodate the intended use and provide for subsurface sewage disposal thereof.

3) Each such parcel shall contain a minimum of I Net Buildable Acre as defined in section 1.4 of this Ordinance.

Response: The Applicant is not proposing to create new parcels (farm or non-farm) as part of the Facility. Therefore, these criteria do not apply.

(c) SETBACK (YARD) REQUIREMENTS. In an F-l (EFU) Zone, the minimum setback requirements shall be as follows:

1) The front and rear yard setbacks from the property line shall be 30 feet, except that the front yard setback from the right-of-way line of an arterial or major collector road or street shall be 50 feet unless approved otherwise by the Planning Commission.

2) Each side yard setback from a property line shall be a minimum of 25 feet, and for parcels or lots involving a non-farm residential use with side yard(s) adjacent to farm lands, said adjacent side yards shall be a minimum of 50 feet unless approved otherwise by the Planning Commission.

Response: The Facility will comply with the applicable front, rear, and side yard setbacks as demonstrated by Figure 3.1 in the Background Information Exhibit. Therefore, these criteria are met.

5.2.1.2 SCZO Section 3.6 Significant Resources Combining Zone (SR)

In a (SR) Combining Zone, the following regulations shall apply:

> *1. Purpose - The purpose of this Zone is to protect significant mineral, geothermal, scenic, natural, unique, archaeological and historical resources identified and so designated by the County's Comprehensive Plan, and to permit development which is compatible with such resources and the applicable protection measures.*
>
> *2. Application - This Zone shall be applied to those sites and resources designated as Significant Resource Sites in the County's Comprehensive Plan Goal 5 Significant Resource Inventory and determined by said Plan to be worthy of full protection (i.e. a 3A Site), or a limited protection site (i.e. a 3C Site) against identified conflicting uses. Such resources identified for ongoing inventories as potential resources shall not be subject to this Zone until, as a result of such inventory(s), said resources are officially designated as a significant resource.*

Response: The Applicant reviewed the County's Comprehensive Plan Goal 5 Significant Resource Inventory and confirmed no applicable Significant Resource Sites with a full protection designation (3A) are located within the Facility site boundary (County 2026). However, the following applicable Significant Resource Sites with limited protection designations (3C) were identified within the micrositing area boundary, as shown on Figure D-4:

- Mineral and aggregate resources categorized as 'significant sites, assigned a limited protection designation (3C) in the County's Comprehensive Plan Goal 5 Significant Resource Inventory, and located within the micrositing area boundary:
    - #25 Sherars Bridge Hwy
        - Located on taxlot 03S16E00002000, owned by State of Oregon.
    - #27 Bourbon Pit
        - Located on taxlot 03S17E00004000, owned by State of Oregon.
- Riparian drainages assigned a limited protection designation (3C) in the County's Comprehensive Plan Goal 5 Significant Resource Inventory and crossed by Facility components:
    - Grass Valley Canyon – crossed by underground 34.5-kV collector lines
    - Cottonwood Canyon – crossed by underground 34.5-kV collector lines
    - Sand Hollow – crossed by underground 34.5-kV collector lines
    - Rosebush Creek – crossed by underground 34.5-kV collector lines
    - Rosebush Canyon – crossed by underground 34.5-kV collector lines

Underground 34.5-kV collector lines that cross resource areas will be installed via underground boring. This method of installation allows for avoidance of ground disturbance within resource

areas and minimizes impacts. Development of the Facility will not result in significant adverse impacts to applicable Significant Resource Sites within the micrositing area boundary, as demonstrated in response to the applicable provisions of SCZO 3.6.2.

SCZO 3.6.4. Review Process and Procedures

> *(a) When a 3A decision (i.e. To fully protect the subject resource) has been made for the significant resource as designated by the County's Plan, any application for a conflicting use or activity listed herein shall be denied unless the applicant can clearly demonstrate that the proposed use or activity will have no significant negative impacts on the resource, or that such impacts can be effectively mitigated, and findings to that effect are established by the designated County Official or the Planning Commission. Findings to this effect shall be based, at a minimum, on consultation with the responsible agency(s) listed within the provisions of this Zone applicable to the subject impacted resource.*

Response: As discussed above in response to SCZO 3.6.2, the Applicant reviewed the County's Comprehensive Plan Goal 5 Significant Resource Inventory and confirmed no applicable Significant Resource Sites with a full protection designation (3A) are located within the micrositing area boundary. Therefore, this provision does not apply.

> *(b) When a 3C decision (i.e. Partial Resource Protection) has been made for the significant resource as designated by the County's Plan, any application for a conflicting use or activity shall be reviewed according to the requirements set forth below:*
>
> > *1) The applicant shall submit a map(s) of the location of the resource site affected by the proposed use or activity, and a written description of the resource type and the potential impacts, positive or negative, of the proposed use or activity.*

Response:

Mineral and aggregate resources:

As described above in response to SCZO 3.6.2 and shown on Figure D-4, the following is a list of the two mineral and aggregate resources categorized as significant sites and assigned a limited protection designation (3C) in the County's Comprehensive Plan Goal 5 Significant Resource Inventory, and located within the micrositing area boundary:

- #25 Sherars Bridge Hwy
  - Located on taxlot 03S16E00002000 and owned by the State of Oregon.
- #27 Bourbon Pit
  - Located on taxlot 03S17E00004000 and owned by the State of Oregon.

As shown on Figure D-4, the Facility components are not anticipated to impact the two significant sites as the components are proposed to be sited outside the sites' associated taxlots (detailed in the list above). For reference, Figure 3.1 in the Background Information Exhibit depicts the preliminary Facility layout. As shown on Figure D-4, and discussed in detail below, the Facility will be sited in compliance with the applicable F-1 zone yard setbacks.

Riparian drainages:

As described above in Section 5.2.1.2 and shown on Figure D-4, the following are the riparian drainages assigned a limited protection designation (3C) in the County's Comprehensive Plan Goal 5 Significant Resource Inventory and crossed by Facility components – details of the specific Facility components within specific riparian areas are included with the respective resource:

- Grass Valley Canyon – crossed by underground 34.5-kV collector lines
- Cottonwood Canyon – crossed by underground 34.5-kV collector lines
- Sand Hollow – crossed by underground 34.5-kV collector lines
- Rosebush Creek – crossed by underground 34.5-kV collector lines
- Rosebush Canyon – crossed by underground 34.5-kV collector lines

All segments of the underground 34.5-kV collector lines that cross these resource areas will be installed via underground boring. This method of installation minimizes impacts to and allows for avoidance of ground disturbance within resource areas.

Therefore, the Facility complies with this criterion.

SCZO 3.6.4(b)(2) The applicant shall submit a written statement stipulating to the proposed mitigation measures to be provided for to minimize or eliminate any potential adverse impacts on the subject resource.

Response:

Mineral and aggregate resources:

As shown on Figure D-4, the Facility components will be sited outside the taxlots associated with the two significant sites (listed above) and are not anticipated to impact the two significant sites. SCZO 1.4.140 defines yard setbacks as open spaces which are unobstructed from the ground upward and SCZO 3.1.4(c) outlines the F-1 zone as having a 30-foot front and rear yard property line setback and a 25-foot side yard property line setback. Based on the yard setback definition outlined in SCZO 1.4.140, the Applicant assumes the F-1 zone setbacks outlined in SCZO 3.1.4(c) apply to aboveground Facility components. The perimeter fencing and solar arrays are the aboveground Facility components nearest to these two significant sites. Based on the preliminary site plan, the Facility's fenceline is approximately 26 feet from the side yard property line of significant site #25 Sherars Bridge Hwy, which complies with the F-1 zone's 25-foot side yard property line setback. Also based on the preliminary Facility layout, the Facility's fenceline is approximately 34 feet from the rear yard property line and 34 feet from the side yard property line of significant site #27 Bourbon Pit, which complies with the F-1 zone's 30-foot rear yard and 25-foot side yard property line setbacks. Therefore, no mitigation is proposed.

Riparian drainages:

The Applicant has coordinated with the Oregon Department of Fish and Wildlife (ODFW) to determine mitigation needs for the Facility as a whole. The mitigation ratios proposed in the Draft Habitat Mitigation Plan (HMP; Attachment G-2 to Exhibit G) were established with input from ODFW. As discussed above, the underground 34.5-kV collector lines that cross applicable riparian

drainage resources will be installed via underground boring. This method of installation minimizes impacts to and allows for avoidance of ground disturbance within resource areas. Thus, mitigation is not anticipated to be needed for installation of these Facility components.

SCZO 3.6.4(b)(3) The applicant shall consult with the responsible resource agency(s) listed in this Zone for the purpose of identifying any limitations on the sitting, construction, operation or maintenance of the proposed use or activity, which would effectively reduce or eliminate any negative impacts to the subject resource site.

Response:

Mineral and aggregate resources:

Applicable responsible agencies listed in the code for this resource category are as follows:

- County Road Dept.;
- Oregon Department of Transportation (ODOT);
- State Dept. of Geo/Mineral Industries;
- Bureau of Land Management.

The Applicant held meetings and is actively coordinating with the County Road Dept. and ODOT about the Facility. Neither the County Road Dept. nor ODOT has raised concerns about potential impacts to the two significant resource sites (listed above) from construction and operation of the Facility. The Applicant has also coordinated with the State Dept. of Geo/Mineral Industries, and they also did not express concerns from construction and operation of the Facility. Coordination with the Bureau of Land Management is unnecessary given that the State of Oregon owns both parcels on which the two significant resource sites are located, and these sites are listed as "ODOT source" aggregate sites on ODOT's material source network map (ODOT 2026). As discussed above and shown on Figure 3.1 in the Background Information Exhibit and Figure D-4 in this exhibit, the aboveground Facility components will be sited in compliance with the applicable F-1 zone setbacks. Impacts to the two adjacent significant resource sites from construction and operation of the Facility is not anticipated; therefore, mitigation is not proposed or anticipated to be necessary. However, should concerns arise, the Applicant will coordinate with the appropriate agency to mitigate any issues, if/as needed.

Riparian drainages:

Applicable responsible agencies listed in the code for this resource category are as follows:

- State Dept. of Fish/Wildlife (including Big Game U.S. Dept. Fish/Wildlife & Sensitive Bird)
- Bureau of Land Management.

The Applicant has coordinated with ODFW to determine mitigation needs for the Facility as a whole. The mitigation ratios proposed in the Draft HMP (Attachment G-2 to Exhibit G) were established with input from ODFW. As discussed above, the underground 34.5-kV collector lines that cross applicable riparian drainage resources will be installed via underground boring. This method of installation minimizes impacts to and allows for avoidance of ground disturbance within

resource areas. Thus, mitigation is not anticipated to be needed for installation of these Facility components. The Applicant does not anticipate correspondence with Bureau of Land Management is necessary, as this agency does not own either parcel on which the two significant resource sites are located. However, should concerns arise, the Applicant will coordinate with the appropriate agency to mitigate any issues, if/as needed.

Therefore, the Facility complies with this criterion.

SCZO 3.6.4(b)(4) In addition to other applicable requirements of this and other County Ordinances, the subject application shall only be approved if it is clearly demonstrated that the proposed use or activity will have no significant negative impact on the subject resource site, or that the reduced preservation review criteria set forth in Subsection 5 are met.

Response:

Mineral and aggregate resources:

As shown on Figure D-4, the Facility components will be sited within the micrositing area and outside the taxlots associated with the two significant sites. As explained above, the F-1 zone setbacks apply to aboveground components. Figure D-4 demonstrates that the aboveground Facility components (perimeter fencing and solar arrays) closest to the taxlots on which #27 and #25 are located will be sited in compliance with the applicable F-1 zone setbacks. For reference, Figure 3.1 in the Background Information Exhibit depicts the preliminary Facility layout.

Therefore, the Facility is not expected to have significant negative impacts on these two significant sites.

Riparian drainages:

As discussed and detailed above in response to SCZO 3.6.4(b)(1)-(3), the only Facility components that cross applicable riparian drainages are underground 34.5-kV collector lines.

The Applicant has coordinated with ODFW to determine mitigation needs for the Facility as a whole. The mitigation ratios proposed in the Draft HMP (Attachment G-2 to Exhibit G) were established with input from ODFW. As discussed above, the underground 34.5-kV collector lines that cross applicable riparian drainage resources will be installed via underground boring. This method of installation minimizes impacts to and allows for avoidance of ground disturbance within resource areas. Thus, mitigation is not anticipated to be needed for installation of these Facility components.

Therefore, the Facility complies with this criterion.

5.2.1.3 SCZO Section 3.7 Natural Hazards (NH) Combining Zone

In any Zone that is combined with the (NH) Combining Zone, the requirements and standards of this Section shall apply in addition to those set forth in the primary zone, provided that if a conflict occurs, the more restrictive provisions shall govern.

1. Purpose - The purpose of the (NH) Combining Zone is to promote and protect the public health, safety and general welfare and to minimize potential losses by providing guidelines for development in hazard areas. Development limitations are applicable to developments in areas of surface water accumulations and high groundwater, unstable or fragile soils, geological hazards, and steep slopes, generally those of 30 percent or greater.

Response: Applicable NH Combining Zone hazard areas are shown on Figure D-3 and analyzed in detail in Exhibit B – Structural Standard and Exhibit C. This response summarizes the applicable analysis and findings from Exhibits B and C:

- Landslides: No mapped landslides are located within the Facility site boundary (Figure B-3 in Exhibit B).
- Earthquakes: The Facility site boundary is in an area of moderate to strong perceived shaking, very light to light potential damage, and slight damage to buildings for an earthquake that has a 2 percent chance of occurring within the next 50 years; a light to moderate perceived shaking, none to very light potential damage, and very slight damage to buildings for a magnitude 9.0 Cascadia earthquake; and a low to very low probability of damaging shaking over the next 50 years.
- Volcanic: The closest volcano to the site boundary is Mount Hood (approximately 37 miles west). In addition, a volcano hazard zone is located approximately 10 miles west/southwest of the site boundary along a drainage.
- Flooding: 100-year floodplains are mapped along drainages within the site boundary that will be avoided with construction and operation of the Facility (see Figures B-3.4, 3.6, 3.9, and 3.10 in Exhibit B).
- Wildfire: As discussed in Exhibit M of this ASC, due to the existing infrastructure, high burn probability, low expected intensity as measured by average flame length, fuels, weather, and topography, overall fire risk for the proposed Facility would be moderate.
- Groundwater: Indicated to be from 16 to 527 feet below ground surface and generally within the basalt bedrock based on a search of water wells located in the vicinity of the Facility site boundary; the majority of well records report water depths of greater than 100 feet (OWRD 2025).
- Lateral spreading: The lateral spreading risk within the Facility site boundary may be moderate to high along drainages. However, it is acknowledged that most of the area within the site boundary is flat and gentle sloping topography and the Facility components are sited to avoid drainages.
- Liquefaction: The potential for significant loss of strength of fine-grained materials and ensuing bearing failure or loss of lateral support during seismic shaking is considered to be low within the Facility site boundary. A liquefaction analysis was not performed and is not judged to be a concern.
- Subsidence: Subsidence due to a seismic event is highly unlikely in the site boundary as the overlying soils are shallow and unsaturated where the Facility will be constructed.

- Unstable or fragile soils: The geotechnical report included as Attachment B-2 to Exhibit B does not identify collapsible soils within the Facility site boundary.
- Wind erosion: The erodibility of the soil types within the site boundary by wind varies widely and ranges from slight among the stony soil types to moderate among the silty soil types (Table C-1 in Exhibit C).
- Water erosion: The erodibility of the soils by water within the site boundary ranges from slight among the stony soil types to moderate among the silty to sandy soil types (Table C-1 in Exhibit C).

As summarized above and detailed in Exhibits B and C, the risks posed by non-seismic geologic hazards listed above are generally considered low because the Facility can be designed to minimize or avoid these areas and the micrositing area minimizes geologic hazard areas. Additionally, the micrositing area does not include steep slopes, generally those of 30% or greater, as identified on the county's zoning map and shown on Figure D-3. Therefore, it is assumed that the Facility components will not be built within County-identified hazard areas of the NH zone and the provisions of SCZO 3.7 would not apply.

5.2.2 SCZO Article 4 – Supplementary Provisions

5.2.2.1 SCZO Section 4.3 Off-Street Parking

At the time a new structure is erected, an existing structure is enlarged, or the use of an existing structure is changed in an R-1, C-1, or M-1 or zone, off-street parking spaces shall be provided as follows, unless greater requirements are otherwise established. Where square feet are specified, the area measured shall be the gross floor area primary to the functioning of the particular use of the property.

[. . .]

5. Commercial Uses: One space per 600 square feet of floor area

6. Industrial Uses: One space per 2000 square feet of floor area

Response: The Facility is considered a utility, which could be classified as either a commercial or industrial use. The Facility will include six fenced O&M areas, each composed of an O&M building, a graveled parking area, and up to two Conex storage containers. These six O&M buildings are the only buildings proposed as part of the Facility.

Each O&M building will be approximately 7,000 square feet and include offices, a kitchen/breakroom, restrooms, and locker rooms with showers. Based on the more conservative parking requirement for commercial uses, each O&M building will require 12 parking spaces. There will be a total of 20 full-time employees hired to operate and maintain the Facility. At a minimum, parking spaces for these 20 full-time employees will be provided within the O&M areas. Therefore, the Facility complies with this criterion.

5.2.2.2 SCZO Section 4.9 Compliance with and Consideration of State and Federal Agency Rules and Regulations

Approval of any use or development proposal pursuant to the provisions of this Ordinance shall require compliance with and consideration of all applicable State and Federal agency rules and regulations.

Response: As discussed within the exhibits and attachments of this ASC, the Applicant has identified applicable state and federal agency rules and regulations and provided evidence of compliance, or commitment to future compliance. Additionally, Sections 5.5, 5.6, and 5.7 of this exhibit identify and address applicable state land use regulations. Section 6.0 of this exhibit addresses the applicability of federal land management plans to the Facility.

5.2.2.3 SCZO Section 4.13 Additional Conditions to Development Proposals

The County may require additional conditions for development proposals. (Ord No. 22-05-2003)

> *1. The proposed use shall not reduce the level of service (LOS) below a D rating for the public transportation system. For developments that are likely to generate more than a V/C ratio of 75 or greater, the applicant shall provide adequate information, such as a traffic impact study or traffic counts, to demonstrate the level of impact to the surrounding road system. The developer shall be required to mitigate impacts attributable to the project.*
>
> *2. The determination of the scope, area, and content of the traffic impact study shall be coordinated with the provider of the affected transportation facility, i.e. city, county, or state.*
>
> *3. Dedication of land for roads, transit facilities, sidewalks, bikeways, paths, or accessways shall be required where necessary to mitigate the impacts to the existing transportation system caused by the proposed use.*
>
> *4. Construction of improvements such as paving, curbing, installation or contribution to traffic signals, construction of sidewalks, bikeways, accessways, paths, or roads that serve the proposed use where necessary to mitigate the impacts to the existing transportation system caused by the proposed use.*

Response: Because the Facility was likely to generate more than a Volume to Capacity (V/C) ratio of 75 during the peak construction traffic commuting hours, the Applicant prepared a Traffic Impact Study (TIS) to address the applicable provisions of SCZO 4.13. The TIS includes detailed analysis on potential impacts to the surrounding road system and proposed mitigation measures (Attachment L-2 in Exhibit L – Public Services). Pursuant to SCZO 4.13.2, the scope, area, and content of the TIS was determined in coordination with the Sherman County Roadmaster Mark Coles in a conference call held on May 19, 2026 (Wikner 2026).

According to the TIS, the Speedway Energy Facility will have the largest impact on local roadways and road users during construction. Construction worker and truck traffic would be concentrated on US-97 to reach the vicinity of the Facility, then be dispersed throughout the local road network surrounding and to the south of Grass Valley. Some traffic slowdowns may be seen on US-97 and

other local roads during the peak of construction. Some traffic could also arrive from the south via US-97, OR-216, and US-197. Oversize loads would only use the roads described and shown in Figure 3 (Attachment L-2 in Exhibit L) for access to the Facility parcels, with several roadway modifications for both turning radius and alignment alternatives proposed to make the routes passable and safe. These are visualized in Appendix B of Attachment L-2. The best management practices (BMPs) described in Section 5.2 of the TIS would be utilized to prevent negative impacts on existing road users or count operations. After construction is complete, minimal operations staff are required to operate the Facility and impacts on traffic would be negligible. Therefore, the Facility complies with the applicable provisions of SCZO 4.13.

5.2.2.4 SCZO Section 4.14 Access Management

1. General - The intent of this section is to manage access to land development to preserve the transportation system in terms of safety, capacity, and function. This ordinance shall apply to all arterials and collectors within Sherman County and to all properties that abut these roadways. This ordinance is adopted to implement the access management policies of Sherman County as set forth in the Transportation System Plan.

Response: The Applicant is actively coordinating with the County Roadmaster to work toward executing a Road Use Agreement that includes input from the County Roadmaster and demonstrates compliance with the appliable provisions of the SCZO and Sherman County Transportation System Plan. An initial Draft Road Use Agreement received from the County is included as Attachment L-4 to Exhibit L. The Road Use Agreement will be finalized in coordination with the County Roadmaster prior to construction. The Facility is not considered a residential or commercial use; therefore, the provisions of SCZO 4.14 specific to residential and commercial uses are not applicable and have been excluded below.

2. Corner Clearance

(a) Corner clearance for connections shall meet or exceed the minimum connection spacing requirements for that roadway.

CORNER SPACING

Functional Classification	Access Category	Urban /Rural	Intersection				Signal Spacing	Median Control
			Public Road		Private Drive			
			Type	Spacing	Type	Spacing		
Arterial[9]	Urban/ Other	U	At grade	770 ft			NA	NA
Collector	NA	R	At grade	1/4 mi.	Lt./Rt. Turns	1,200 ft.	NA	NA
Local Street	NA	R	At grade	200-400 ft	Lt./Rt. Turns	Vary	NA	NA

[9] Management of access to State Highway is controlled by Oregon Department of Transportation. The 1999 Highway Plan and OAR 734.051. *Deviations to access standards may be granted following the processes outlined in the Oregon Administrative Rules.*

It should be noted that existing developments and legal accesses on the transportation network would not be affected by the recommended access management standards until one or more of the following actions is taken:

1) Either a land use action is proposed,

2) A safety or capacity deficiency is identified that requires specific mitigation,

3) A specific access management strategy/plan is developed,

4) Redevelopment of existing properties along the highway occurs, or

5) A major construction project is begun on the street.

(b) New connections shall not be permitted within the functional area of an intersection or interchange as defined in paragraph 1 above, unless no other reasonable access to the property is available.

(c) Where no other alternatives exist, the County may allow construction of an access connection along the property line farthest from the intersection. In such cases, directional connections (i.e. right in/out, right in only, or right out only) may be required.

Response: The Facility's proposed access points are shown on Figure 3.1 in the Background Information Exhibit. Based on the preliminary design shown on this figure, there are 63 access points proposed on existing county roads. Specifically, the preliminary design proposes 5 access points off Macinerny Road, 11 access points off Lone Rock Road, 6 access points off Blagg Lane, 6 access points off Rutledge Road/Rutledge Lane, 1 access point off Earls Lane, 7 access points off Finnegan Road, 6 access points off Bourbon Lane, 3 access points off Stark Road, 1 access point off Rolfe Lane, 2 access points off Michigan Lane, 1 access point off Stradley Road, 10 access points off Twin Lakes Road, 1 access point off Ball Lane, and 3 access points off Davis Lane.

Access roads would be constructed of crushed aggregate approximately 16–24 feet wide. As discussed above, the Applicant is actively coordinating with the County Roadmaster and an initial draft Road Use Agreement from the County Roadmaster supports compliance with the appliable provisions of the SCZO and Sherman County Transportation System Plan, see Attachment L-4 to Exhibit L. Prior to construction, the Road Use Agreement will be finalized to reflect the final design and requested access points in coordination with the County Roadmaster. The number of access points that connect to existing county roads is subject to change in final design and the Applicant will obtain Approach Road Permits for each of the finalized access points that connect to existing county roads. As part of this coordination and finalization process, compliance with the applicable provisions of the SCZO and Sherman County Transportation System Plan will be verified.

The preliminary design shown on Figure 3.1 in the Background Information Exhibit also shows access points that connect the Facility's corresponding access roads to portions of US-97 and OR-216 with rights of way regulated by ODOT. The Applicant will use existing access points on these

two highways to the extent practicable and will coordinate with ODOT on siting of additional access points as required.

4. Access Connection and Driveway Design

(a) Driveways shall meet the following standards:

1) If the driveway is a one way in or one way out drive, then the driveway shall be a minimum width of 10 feet and a maximum width of 12 feet and shall have appropriate signage designating the driveway as a one way connection.

2) For two-way access, each lane shall have a minimum width of 16 feet and a maximum width of 24 feet.

(b) Driveway approaches must be designed and located to provide an exiting vehicle with an unobstructed view of the street for a distance based on the stopping distance of a vehicle traveling at the posted speed of the street. Construction of driveways along acceleration or deceleration lanes and tapers shall be avoided due to the potential for vehicular weaving conflicts.

(c) The length of driveways shall be designed in accordance with the anticipated storage length needed for entering and exiting vehicles to prevent vehicles from backing into the flow of traffic on the public road or causing unsafe conflicts with on-site circulation.

Response: As stated above, the preliminary design shown on Figure 3.1 in the Background Information exhibit includes 63 access points that connect the Facility's corresponding access roads to existing county roads. Each access point will provide two-way access and shall have a minimum width of 16 feet and a maximum width of 24 feet. The number of access points that connect to existing county roads is subject to change in final design and the Applicant will obtain Approach Road Permits for each of the finalized access points that connect to existing county roads. These access points and associated intersections will be designed and constructed consistent with the requirements of the SCZO and the County's Transportation System Plan.

As stated above, the preliminary design shown on Figure 3.1 in the Background Information Exhibit also shows access points and associated intersections that connect the Facility's corresponding access roads to portions of US-97 and OR-216 with rights of way regulated by ODOT. The Applicant will use existing access points on these two highways to the extent practicable and will coordinate with ODOT on siting of additional access points as required.

5.2.2.5 SCZO Section 4.15 Pedestrian and Bicycle Access and Facilities

1. General

The purpose of this section is to provide for safe and convenient pedestrian, bicycle and vehicular circulation consistent with access management standards and the function of affected streets.

2. On-site facilities should be provided, where appropriate, to accommodate safe and convenient pedestrian and bicycle access.

[subsections (a) through (c) omitted as they're not applicable to utility developments]

Response: The proposed Facility falls within a utility use category. The site boundary is fenced, not open to the public, and located in a rural location with low traffic volumes. The above criteria do not require pedestrian or bicycle access or circulation for utility developments. Staff operating the Facility will use the proposed and existing internal access roads to maneuver within the fenced Facility site boundary. Parking spaces for the 20 full-time employees will be provided within the O&M areas.

5.2.3 SCZO Article 5 – Conditional Uses

5.2.3.1 SCZO Section 5.2 General Criteria

In determining whether or not a Conditional Use proposal shall be approved or denied, it shall be determined that the following criteria are either met or can be met through compliance with specific conditions of approval.

1. The proposal is compatible with the County Comprehensive Plan and applicable Policies.

Response: The applicable SCCP goals and policies are addressed in Section 5.4 of this application. As demonstrated in Section 5.4, the Facility complies with the applicable SCCP goals and policies.

2. The proposal is in compliance with the requirements set forth by the applicable primary Zone, by any applicable combining zone, and other provisions of this Ordinance that are determined applicable to the subject use.

Response: As previously mentioned, the Facility is located entirely within the Sherman County F-1 zone. Portions of the Facility site boundary contain areas within the SR combining zone and NH combining zone. The Applicant has addressed applicable criteria above in Section 5.2.1. As discussed above, the Facility is consistent with the base zone and applicable combining zones. Therefore, this criterion is satisfied.

3. That, for a proposal requiring approvals or permits from other local, state and/or federal agencies, evidence of such approval or permit compliance is established or can be assured prior to final approval.

Response: Exhibit A of this ASC lists all applicable federal, state, and local permits that the Applicant will obtain prior to construction of the Facility.

4. The proposal is in compliance with specific standards, conditions and limitations set forth for the subject use in this Article and other specific relative standards required by this or other County Ordinance.

Response: The Facility can be authorized through a conditional use permit review in the F-1 zone pursuant to SCZO 3.1.3(q) and (z). The conditional use standards of SCZO 5.8 are addressed below in Section 5.2.3.3.

5. That no approval be granted for any use which is or expected to be found to exceed resource or public facility carrying capacities, or for any use which is found to not be in compliance with air, water, land, and solid waste or noise pollution standards.

Response: As discussed in Exhibit L, the Facility will not cause a significant burden on resource or public facility carrying capacities and is not expected to have significant adverse impacts on public or private service providers in the analysis area during construction or operation. Noise compliance regulations are evaluated in Exhibit O3 and support that the Facility during operation will comply with state standards (i.e., OAR 340-035-0035). Construction activities are temporary and categorically exempted under OAR 340-35-0035(5)(g). Therefore, the Facility is not likely to result in significant adverse impacts to public services within the analysis area and complies with this criterion.

6. That no approval be granted for any use violation of this Ordinance.

Response: As discussed above in Section 5.2.1.1, the majority of the Facility components and associated infrastructure fall under the definition of "commercial utility facility," which is permitted conditionally in the F-1 zone. The 500-kV gen-tie transmission line and aboveground 230-kV collector lines are not expressly included in this use category, but are allowed uses in the F-1 zone, as discussed under ORS 215.274 in Section 5.5.1.1 and ORS 215.275 in Section 5.5.1.2, respectively. Additionally, the Facility's compliance with other applicable provisions of the SCZO, Sherman County 2007 Wind Ordinance, and SCCP is demonstrated throughout this Exhibit D. Therefore, the Facility complies with this provision.

5.2.3.2 SCZO Section 5.3 General Conditions

In addition to the standards and conditions set forth in a specific Zone, this Article, this Ordinance, and other applicable local, county, state and/or federal regulations, additional conditions may be imposed which are found to be necessary to avoid a detrimental impact on adjoining properties, the general area, or the County as a whole, and to otherwise protect the general welfare and interests of the surrounding area, the County as a whole and the general public. Such conditions may include, but are not limited to, the following:

1. Limiting the manner in which the use is conducted, including restricting the time an activity may take place, and restrictions to minimize environmental impacts such as noise, vibration, air or water pollution, glare and odor.

2. Establishing a special setback or other open space requirements, and increasing the required lot size or other dimensional standards.

3. Limiting the height, size or location of a building or other structure or use.

4. Increasing street width and/or requiring improvements to public streets and other public facilities serving the proposed use, even including those off-site but necessary to serve the subject proposal.

5. Designating the size, number, improvements, location and nature of vehicle access points and routes, and requiring pedestrian and/or bicycle ways.

6. Limiting or otherwise designating the number, size, location, height, and lighting of signs and outdoor or security lighting, and the intensity and/or direction thereof.

7. Requiring diking, screening, fencing, or other improvements or facilities deemed necessary to protect adjacent or nearby properties, and establishing requirements or standards for the installation and maintenance thereof.

8. Protecting and/or preserving existing trees, other vegetation, and water, scenic, historic, archaeological, unique, landmark, or other natural or manmade significant resources.

Response: The Applicant understands the Council may impose standard conditions, including conditions recommended by the County in its role as the Special Advisory Group for the Facility.

5.2.3.3 SCZO Section 5.8 Standards Governing Specific Conditional Uses

A Conditional Use set forth by this Ordinance shall be subject to review by the Planning Commission in accordance with the public hearing requirements set forth in this Ordinance.

10. Radio or Television Transmitter Tower, Utility Station or Substation - When authorized as a Conditional Use, the following standards and limitations shall apply:

(a) In a residential zone or area, all equipment storage on the site shall be enclosed within a building.

(b) The use may be required to be fenced and provided with landscaping.

(c) Coloring of structures, buildings and other permanent installations shall be of neutral colors or as otherwise required by the Commission or reviewing authority.

Response: The Facility is not within a residential area or zone. The Facility O&M buildings, collector substations, solar arrays, BESS, central substation, and temporary construction areas will be within fenced enclosures, enclosed individually. Security gates will be installed at access points. The Facility substations will be a neutral color, or otherwise if required by the Council.

14. Public Facilities and Services

(a) Public facilities including, but not limited to, utility substations, sewage treatment plants, storm water and water lines, water storage tanks, radio and television transmitters, electrical generation and transmission devices, fire stations and other public

facilities shall be located so as to best serve the County or area with a minimum impact on neighborhoods, and with consideration for natural or aesthetic values.

(b) Structures shall be designed to be as unobtrusive as possible. Wherever feasible, all utility components shall be placed underground.

(c) Public facilities and services proposed within a wetland or riparian area shall provide findings that: Such a location is required and a public need exists; and Dredge, fill and adverse impacts are avoided or minimized.

Response: The Applicant anticipates that the Facility would be considered public facilities and services subject to SCZO 5.8.14. For the reasons stated elsewhere within Exhibit D, the substations, wind components, solar components, shared components, 230-kv collector lines and 500-kV gen-tie line will be located to best serve Sherman County to minimize impacts to surrounding lands, natural features and aesthetic values.

The Facility is in an area that would have minimal impacts on neighborhoods both from a natural and aesthetic value consideration. To avoid and minimize visual impacts, the Applicant has sited the Facility in a remote area of Sherman County and designed the turbine layout and solar arrays such that visibility would be minimized as much as practicable from the nearest towns. The Facility has been designed in accordance with the Sherman County 2007 Wind Power Ordinance (County 2007) that contains wind turbine setback requirements for protection of nonparticipating landowners (see Section 5.3 and Figure D-10). Thus, turbines would be appropriately set back from project boundaries, constraints, surrounding land uses, and the rights-of-way of county roads and state and interstate highways. Turbines would be painted with a grey, white, or off-white, low-reflectivity coating to minimize reflection and contrast with the sky; this reduces the visual impact of skylining and makes the turbines highly visible to daytime pilots. Similarly, the O&M buildings, substations and BESS would be designed/painted to be generally consistent with the surrounding landscape. The aboveground collection lines would be routed adjacent to existing infrastructure (e.g., roads, transmission lines) to minimize visual impacts. Support towers for the aboveground collection lines would be either steel or wood—which would largely blend with the surroundings—or steel, which would have a low-reflectivity coating. The solar module crystalline cells will be housed within antireflective glass panels to prevent glare. The 34.5-kV collector lines proposed within the site boundary will be placed 3 feet below grade and will not be obtrusive.

As discussed in Exhibit O1 – Wetlands and Other Waters, construction and operation are not anticipated to adversely affect waters of the state. Permanent impacts to waters of the state have been intentionally avoided. Minor temporary impacts are proposed during construction. There are five narrow intermittent streams that will be temporarily impacted (see Exhibit O1, Table O1-3) in order to trench and bury the 34.5-kV collector lines. The widths of these seasonal streams vary from 1 to 5 feet wide. The sites will be restored to their original contours. Removal and fill within wetlands will be kept to a minimum and if more than 50 cubic yards of material are removed or filled within wetland boundaries or below the ordinary high-water line of other waters, a permit from the Oregon Department of State Lands will be obtained.

20. Non-farm Uses in an F-1 Zone - Non-farm uses, excluding farm related, farm accessory uses, or uses conducted in conjunction with a farm use as a secondary use thereof, may be approved upon a finding that each such use:

1. Is compatible with farm uses described in ORD 215.203(2);

Response: The Facility is composed of multiple uses as discussed in Section 5.2.1.1: the Wind Facility, Solar Facility, 500-kV gen-tie line, and 230-kV collector lines. Each of these uses is a non-farm use in the F-1 zone. However, these uses fall into separate land use categories. As described above in Section 5.2.1, the Wind Facility and Solar Facility fall under the County's "commercial utility facility" use category in the F-1 zone, but the 500-kV gen-tie transmission line and aboveground 230-kV collector lines do not. Therefore, the Applicant has directly applied ORS 215.283(1)(c). The 500-kV gen-tie transmission line and aboveground 230-kV collector lines can be established as "utility facilities necessary for public service" pursuant to ORS 215.283(1)(c)(B) and ORS 215.283(1)(c)(A), respectively. The ORS 215.274 standards applicable to the 500-kV gen-tie transmission line are addressed below in Section 5.5.1.1 and the ORS 215.275 standards applicable to the aboveground 230-kV collector line are addressed below in Section 5.5.1.2.

"Farm use" for purposes of SCZO 5.8(20)(1) is the employment of land for raising, harvesting and selling crops for profit, primarily dryland wheat with some livestock grazing. Typical compatibility issues for this type of farm use include disturbance of planting, farm management (spraying chemicals and fertilizer, livestock grazing rotations, etc.), and harvest schedules during facility construction. As the Wind Facility, Solar Facility, 500-kV gen-tie line, and 230-kV collector lines are interspersed through much of the site boundary, the analysis of compatibility is considered in context to the entire Facility (as opposed to analyzing compatibility for each facility separately).

Assessment of impacts to farm practices and farm operations is required by OAR 660-033-0130(5), with specific direction to look at traffic, water availability and delivery, introduction of weeds or pests, damage to crops or livestock, litter, trespass, reduction in crop yields, or flooding. The Applicant has also included review of potential impacts related to dust and erosion and fire risk. The assessment required by OAR 660-033-0130(5) is included in Section 5.5.2.1 below.

The assessment in Section 5.5.2.1 finds that none of the listed impacts have risen to the level significant enough to have an important influence or effect on the farm operations within the surrounding lands adjacent to the Facility. Collectively, prevention, mitigation and monitoring efforts discussed in Exhibits C, L, M, N (Waste Minimization), and O2 (Water Use) will alleviate potential impacts from traffic, water availability and delivery, weeds and pests, damage to crops or livestock, litter and trespassing, reduction in crop yields, flooding, dust and soil erosion and fire risk. There are no unique farm practices within the surrounding lands requiring special site conditions that would be at risk due to the proposed Facility.

For these reasons, the Council may find that the Facility will be compatible with farm uses.

2. Does not interfere seriously with accepted farming practices on adjacent lands devoted to farm use;

Response: The criterion above is included in the criteria of OAR 660-033-0130(5), which are addressed below in Section 5.5.2.1.

3. Does not materially alter the overall land use pattern of the area;

Response: Previously when addressing SCZO 5.8.20(3), ODOE pointed to the provisions under OAR 660-033-0130(38)(h)(G) to help interpret compliance with this provision.[10] Under Section 5.5.2.3, the Applicant addresses OAR 660-033-0130(38), including subsection (i)(D) which includes the Land Conversation and Development Commission (LCDC) test for evaluating stability of an area's land use pattern that is equivalent to the LCDC test under subsection (h)(G) but with a greater acreage threshold (80 acres vs 48 acres, respectively). While ODOE has acknowledged that neither test in LCDC's rule under subsection (h)(G) or (i)(D) is directly applicable, ODOE has previously used the test under (h)(G) to provide context for evaluating this criterion. With this in mind, the Applicant has walked through this LCDC test for evaluating stability of an area's land use pattern in the context of the Facility below.

For purposes of addressing this criterion, the Applicant defines the "area" as the approximately 322,000-acre area that constitutes the southern half of Sherman County, south of Moro. The existing land use pattern of this area appears to generally consist of dryland wheat or similar crop cultivation, rangeland, and undeveloped or uncultivated lands (Figures D-6 and D-11, Google Earth 2026). This area includes a few incorporated towns and rural nodes, and the topography consists of rolling hills and drainages, with some canyons on the peripheral or outermost areas.

Although no non-farm dwellings are proposed, the Applicant considers the LCDC test in the context of the proposed non-farm structures as follows:

Wind Components

The Facility's wind components would permanently occupy approximately 48 acres and the shared components that would be used by the Wind Facility are anticipated to occupy a total of 147 acres, resulting in a total of 195 acres associated with the Wind Facility. This would amount to approximately 0.06 percent of land being removed from production within the 322,000-acre overall land use area (defined above) for the life of the Facility's wind components. Sherman County as a whole contains approximately 402,516 acres in farms, which occupies approximately 76 percent of the county's total land (U.S. Census Bureau 2024, USDA 2022c). The Facility's wind components will occupy approximately 0.05 percent of the county's farmland. Payments to underlying landowners from lease agreements that allow siting of the Facility's wind components within the micrositing area will provide opportunity to expand farming. With this additional revenue, farms and landowners within the Facility site boundary could invest in farmland outside the Facility site boundary, or use the revenue to stabilize existing farm operations within or outside the Facility site boundary (as noted by some of the landowners in Table D-6). Additionally, none of the Facility's underlying landowners expressed concerns about their ability to continue farming adjacent to the Facility's wind components in their responses to landowner surveys (Table D-6).

[10] Final Order on Request for Amendment 4 for the Biglow Canyon Wind Farm, March 2026, p. 111

As discussed in detail in Exhibit O2, water needed for construction of the Facility's wind components will be obtained from the City of Wasco, the City of Rufus, and/or other suppliers identified by the Applicant with existing municipal water rights. Given the municipal sources of this water, the Facility's construction water needs for the wind components will not compete with the ability of farmers in the area to acquire water rights. Operations water use will be minimal and general daily use (handwashing, drinking, toilets) will not exceed 5,000 gallons per day. The Applicant may either construct an exempt well, allowed under ORS 537.545, or obtain bulk water from the same sources as during construction. Given that the operational water needs of the Facility represent an insignificant fraction of the total municipal water use in the area, existing water rights will not be negatively affected, and sufficient water will be available for the intended uses. In summary, water for the Facility's wind components will be obtained from municipal sources under existing municipal water rights and/or an exempt on-site well allowed under ORS 537.545; therefore, construction and operation of the Facility's wind components will not have an impact on the availability of irrigation water rights in the area or within the county.

For the reasons outlined above, the Facility's wind components would not diminish opportunities for farms on surrounding lands and lands in southern Sherman County to expand, purchase, or lease farmland or access existing water rights or acquire new water rights. Rather, the lease incomes from the Facility and resources provided by the Agricultural Investment Fund may help both participating and non-participating farmers in the area expand their existing agricultural operations. The Facility's wind components would not diminish the number of tracts or acreage in farm use in a manner that will destabilize the overall character of the area. The underlying land will remain legally configured, meaning no parcels or tracts will be reduced. The overall land use pattern would not be materially impacted because the Wind Facility is compatible with farming, a relatively porous site feature, and is limited to a reasonably small percentage of the area farmed.

Solar and shared components

As depicted in the Facility's preliminary site plan (Figure 3-3 of the Background Information Exhibit), the Facility's solar and shared components would occupy approximately 8,043 acres within the 322,000-acre area defined above. This would amount to approximately 2.5 percent of land being removed from production within the overall land use area for the life of the Facility's solar and shared components. Even if the Solar Facility required an up to 8,500 acres area for the solar and shared components (i.e. the maximum acreage being requested for Goal 3 exception, see Section 5.7), this would still only amount to approximately 2.6 percent of land being removed from production in the overall land use area for the Solar Facility's operating period. As noted above, Sherman County as a whole contains approximately 402,516 acres in farms, which occupies approximately 76 percent of the county's total land (U.S. Census Bureau 2024, USDA 2022c). The Facility's solar and shared components will occupy up to approximately 2 percent of the county's farmland. As discussed in Section 3.3.2.1, none of the solar and shared components will permanently impact high-value farmland as final design will avoid permanent impacts to all place of use irrigation water rights.

Further, payments to underlying landowners from lease agreements that allow siting of the Facility's solar and shared components within the micrositing area will provide the opportunity to expand farming. With this additional revenue, farms and landowners within the Facility site boundary could invest in farmland outside the Facility site boundary, or use the revenue to stabilize existing farm operations within or outside the Facility site boundary. Contributions in the Agricultural Investment Fund will also provide broader benefits to improve agricultural opportunity in the area.

Many Facility landowners have a desire to maintain farming practices on their properties (Table D-6). The landowners worked with the Applicant to exclude the more productive/more suitable portions of agricultural and grazing lands in their holdings from the Facility leases, forgoing revenue from Facility operations in the interest of preserving agriculture within the community. Revenue generated from the Facility will be used to subsidize the remaining farming operations on the more productive lands.

As discussed in detail in Exhibit O2, water needed for construction of the Facility's solar and shared components will be obtained from the City of Wasco, the City of Rufus, and/or other suppliers identified by the Applicant with existing municipal water rights. Given the municipal sources of this water, the Facility's construction water needs for the solar and shared components will not compete with the ability of farmers in the area to acquire water rights. Operations water use will be minimal and general daily use (handwashing, drinking, toilets) will not exceed 5,000 gallons per day. The Applicant may either construct an exempt well, allowed under ORS 537.545, or obtain bulk water from the same sources as during construction. Water for periodic panel washing, if needed, would be supplied by the same sources. The Oregon Water Resources Department allows exempt well(s) to be used for long-term operational use such as for solar panel washing as long as withdrawals maintain compliance with ORS 537.545(1)(f) by not exceeding 5,000 gallons per day for all wells combined without securing a withdrawal permit. Given that the operational water needs of the Facility represent an insignificant fraction of the total municipal water use in the area, existing water rights will not be negatively affected, and sufficient water will be available for the intended uses. In summary, water for the Facility's solar and shared components will be obtained from municipal sources under existing municipal water rights or an exempt on-site well allowed under ORS 537.545; therefore, construction and operation of the Facility's solar and shared components will not have an impact on the availability of irrigation water rights in the area or within the county.

For the reasons outlined above, the Facility's solar and shared components would not diminish opportunities for farms on surrounding lands and lands in southern Sherman County to expand, purchase, or lease farmland. The Facility's solar and shared components would not diminish the number of tracts or acreage in farm use in a manner that will destabilize the overall character of the area. The underlying land will remain legally configured, meaning no parcels or tracts will be reduced. The overall land use pattern would not be materially impacted because the Solar Facility is compatible with farming and is limited to a reasonably small percentage of the area farmed.

Summary

Unlike other non-farm uses such as non-farm dwellings, the Facility's wind, solar, and shared components will be decommissioned, retired, and the land will be restored at the end of operations. As demonstrated in Sections 5.5.2.1 and 5.7.3 of this Exhibit D, the Facility would not diminish opportunities for farms on surrounding lands and lands in southern Sherman County to expand, purchase, or lease farmland or access existing water rights or acquire new water rights and would not diminish the number of tracts or acreage in farm use in a manner that will destabilize the overall character of the area. The overall land use pattern would not be materially impacted because the Facility is compatible with farming and is limited to a reasonably small percentage of the area farmed. However, were ODOE to conclude that this factor was not satisfied with respect to the Solar Facility, per the Final Order on Request for Amendment 4 for the Biglow Canyon Wind Farm, March 2026, p. 111, the Council may still authorize approval of the site certificate if it determines that an exception to statewide planning Goal 3 is justified, as discussed in Section 5.7.

> *4. Is situated upon generally unsuitable land for the production of farm crops and livestock, considering the terrain, adverse soil or land conditions, drainage and flooding, vegetation, location and size of the tract, and the availability of necessary support resources for agriculture;*

Response: The Facility is sited on land that is generally unsuitable for the production of farm crops and livestock, considering adverse soil or land conditions such as the arid climate and lack of irrigation. As noted by several landowners in their survey responses, the land in wheat cultivation has average yields of 37.5 bushels per acre, which is notably lower than the 10-year countywide normalized average of 51 bushels per acre (see Attachment D-1). Furthermore, landowners identified portions of their tracts for the Facility lease areas that are less productive/less suitable for farm crops and livestock. These landowners seek to maximize the profitability of their lands and therefore worked with the Applicant to exclude the more productive/more suitable portions of agricultural lands in their holdings from the Facility leases. The areas being leased to the Facility are described by many landowners as highly erodible and limited in production due to soil depth and precipitation and lack of irrigation. Furthermore, the Facility will avoid all permanent impacts to the limited areas of high-value farmland located within the site boundary. Therefore, the Applicant maintains that the Facility complies with this code provision.

Furthermore, EFSC may determine that this provision under SCZO 5.8.20.4 is not an "applicable substantive criteria" as defined in OAR 345-022-0030(3) because it is not a land use regulation required by statewide planning goals and does not implement any requirements of Statewide Goal 3 (Agriculture). See, e.g., EFSC, Final Order on the ASC for the Nolin Hills Wind Power Project (July 19, 2023), at p.78 (concluding that county rural residence setback was not required by Goal 3 and thus not an applicable substantive criterion). Furthermore, as evidenced by Sections 4.0 and 5.7, the Facility is compliant (or an exception is justified) with respect to Oregon's statewide planning goals. However, were ODOE to conclude that this factor was not satisfied with respect to the Solar Facility, per the Final Order on Request for Amendment 4 for the Biglow Canyon Wind Farm, March 2026, p. 111, the Council may still authorize approval of the site certificate if it determines that an exception to statewide planning Goal 3 is justified, as discussed in Section 5.7.

5. Complies with other applicable significant resource provisions; and

Response: There are no known other significant resource provisions applicable to the Facility that have not been previously addressed.

6. Complies with such other conditions as deemed necessary.

Response: The Facility will comply with all conditions of approval imposed by EFSC in granting the site certificate.

5.3 Compliance with Sherman County 2007 Wind Power Ordinance

Section 1. Purpose.

It is the intention of Sherman County to encourage the collaboration and cooperation of neighboring property owners and project developers to establish appropriate set back requirements between neighboring projects. The purpose of this Ordinance is to establish standards which shall be applied to boundaries where the developers of adjacent, separate wind projects cannot agree on set back requirements for the wind towers of their respective projects. The requirements of this ordinance are intended to apply to all wind power projects in the County whether sited pursuant to Energy Facility Siting Council (EFSC) under ORS Chapter 469 or County Conditional Use Permit.

Section 2. Definitions.

a. Boundary Set Backs. The minimum distance measured from an operating wind turbine in a project to the outer boundary lines of said project.

b. Mutually Negotiated Set Back. A set back boundary which is negotiated between developers of a project with adjacent project developers and land owners outside the project.

Section 3. Procedure.

a. Prior to application for a permit for wind power projects in Sherman County, the project developer is encouraged to negotiate set back distances from wind turbines on the outer edges-of the project to the outer boundary lines of the project with owners or developers of adjacent projects or adjacent property owners outside the project.

b. In the event the project developer is unable or unwilling to negotiate boundary set backs, then the Sherman County wind power siting set back requirements of this ordinance shall apply.

Section 4. Set Back Distances.

a. Set back from property lines in all East-West upwind and downwind directional property line installation shall be no less than 7.5 times the rotor diameter and no less than 1.5 times the rotor diameter for all North-South property line delineations. These requirements shall only apply to project boundaries and will not be required for towers installed internally within the project.

Response: The Applicant acknowledges the purpose, definitions, and procedure sections of the Sherman County 2007 Wind Power Ordinance. In particular, Applicant acknowledges that Section 3 of the ordinance sets forth two options to comply: (a) "mutually negotiated" setbacks with adjacent landowners or (b) the default setbacks specified in the ordinance, Section 4.

As demonstrated and shown on Figure D-10, all but one of the proposed turbine towers comply with the Section 4 default setbacks in all East-West upwind and downwind directions and all North-South directions with respect to the site boundary. The east-west setback associated with the one other location (Turbine 42) extends outside the Facility site boundary but remains within the boundaries of contiguous property that is leased by Applicant and owned by the same participating landowner (Tract 15; see Figure D-5) and thus complies with the east-west setback with respect to the relevant "property line" as contemplated in the ordinance[11]. In the event ODOE were to conclude this east-west setback for Turbine 42 does not comply with the ordinance's default setbacks in Section 4, per Section 2.b and 3.a of the ordinance, the Applicant's lease with the Tract 15 landowner constitutes a functional "mutually negotiated setback" because it authorizes construction of Turbine 42 and any other turbines within the leased area. If EFSC were to determine that such lease does not function as a "mutually negotiated setback," then consistent with the ordinance, Section 3.a, and the approach taken in the Biglow Canyon Wind Farm Final Order on Amendment #3, October 2008, pp. 20-21, 57, the Applicant could execute a separate setback agreement with the landowner of Tract 15. Under any of these approaches, the Facility would comply with this setback ordinance.

> *b. A variance may be issued to set back standards in cases where extraordinary topographical or geographical conditions would justify the granting of a variance. A variance may be applied for pursuant to Article 7, Variances, of the Sherman County Zoning Ordinance.*

Response: As demonstrated above, the Facility would comply with the setback distances of this ordinance or a mutually negotiated setback agreement, thus a variance is not needed. Therefore, this provision does not apply.

Section 5. Set Backs From Pre-Existing Wind Turbines.

> *The minimum set back requirements from pre-existing wind turbines shall be 15 times the rotor diameter upwind and downwind for all East-West set back considerations and 3 times the rotor diameter for all North-South set back considerations.*

Response: As shown on Figure D-5, and Figure 4 in the Background Information Exhibit, no pre-existing wind turbines are within 0.5 mile of the Facility site boundary. Therefore, this provision does not apply.

Section 6. Set Backs From City Boundaries.

[11] The ordinance does not define the relevant "property line" for purposes of these setbacks. The Sherman County Zoning Ordinance defines "property line" as "the division line between 2 units of land." SCZO 104.101. "Unit of land" is undefined in the Zoning Ordinance.

The minimum set back distance from an operating wind turbine to the boundary lines of any incorporated city in Sherman County - shall be a distance of one (1) mile, unless a variance to such distance is obtained through the city council of an affected city, after public hearing.

Response: The city boundary nearest to the Facility is Grass Valley. As shown on Figure D-10, each of the Facility's 44 proposed wind turbine towers are located more than 1 mile from the closest portion of the Grass Valley Urban Growth Boundary. Therefore, the Facility complies with this criterion.

Section 7. Emergency Clause.

This Ordinance, being essential to the preservation of the health, safety, welfare and financial integrity of the County, an emergency is hereby declared to exist and this Ordinance is effective upon its adoption.

Response: The Applicant acknowledges the emergency clause and does not anticipate this specific provision of the ordinance to the applicable to the Facility.

5.4 Compliance with Sherman County Comprehensive Plan

5.4.1 Planning Process and Citizen Involvement – Section VIII

Goal I. To provide the opportunity for all citizens and effected agencies to participate in the planning process.

Policy I. All land use planning public hearings, requiring public notice, shall be advertised in a general circulation newspaper and be open to the public.

Policy II. All effected agencies and effected landowners shall be notified by written notice of any proposed site-specific land use change.

Response: The Applicant is seeking EFSC's determination of compliance with land use standards and procedures, in lieu of the County's process. Applicable provisions from the SCZO, Sherman County's 2007 Wind Power Ordinance, and SCCP, and applicable OARs and ORSs, are addressed throughout this exhibit. Citizen involvement is a key component of EFSC's process. Community members and public agencies have been contacted for the Notice of Intent and will continue to be notified throughout the site certification process and given the opportunity to comment on the proposed changes. The Applicant has also met with community members and stakeholder groups individually to discuss the Facility, avoidance and minimization measures, agricultural impacts and mitigation, and other community concerns and community benefits. Input received has helped shape the proposed design of the Facility and the content of the ASC.

5.4.2 Physical Characteristics – Section XI

Goal I. Improve or maintain the existing quality of the physical environment within the County.

Policy I. Erosion control provisions shall be incorporated into the subdivision requirements of the Development Code. These shall require that the best practical methods be used to control

erosion from road and building construction sites as well as other changes in land use, which may degrade the quality of the land, air and water.

Response: The Applicant does not anticipate significant erosion impacts associated with construction of the Facility. Prior to construction, the Applicant will obtain a National Pollutant Discharge Elimination System (NPDES) 1200-C permit from the Oregon Department of Environmental Quality (ODEQ). Additionally, the Applicant has prepared a Draft Erosion and Sediment Control Plan (ESCP), which is included in this pASC as Attachment C-1 to Exhibit C.

Policy II. Lands designated as potential natural hazard areas shall be evaluated by a competent authority prior to the initiation of construction of any permanent structure. The evaluation shall include base data and contain an analysis of the probable physical impacts of the proposed development. Such an evaluation shall be done at the expense of the developer. The County shall support and assist reasonable efforts to more explicitly define natural hazard areas. When such information becomes available it shall be incorporated into the Resource Document. If appropriate, goals and policies will be developed, adopted and integrated into the Comprehensive Plan.

Response: As described above in response to SCZO 3.7 in Section 5.2.1.3, applicable NH Combining Zone hazard areas are shown on Figure D-3 and analyzed in detail in Exhibits B and C. The response to SCZO 3.7, which summarizes the applicable analysis and findings from Exhibits B and C, is included below:

- Landslides: No mapped landslides are located within the Facility site boundary (Figure B-3 in Exhibit B).
- Earthquakes: The Facility site boundary is in an area of moderate to strong perceived shaking, very light to light potential damage, and slight damage to buildings for an earthquake that has a 2 percent chance of occurring within the next 50 years; a light to moderate perceived shaking, none to very light potential damage, and very slight damage to buildings for an magnitude 9.0 Cascadia earthquake; and a low to very low probability of damaging shaking over the next 50 years.
- Volcanic: The closest volcano to the site boundary is Mount Hood (approximately 37 miles west). In addition, a volcano hazard zone is located approximately 10 miles west/southwest of the site boundary along a drainage.
- Flooding: 100-year floodplains are mapped along drainages within the site boundary that (see Figures B-3.4, 3.6, 3.9, and 3.10 in Exhibit B). The Facility would include 0.1 acre of permanent impacts from a fenceline and an access road; and temporary construction impacts to 0.7 acre including an access road, a fenceline, and collection lines.
- Wildfire: Due to the existing infrastructure, high burn probability, low expected intensity as measured by average flame length, fuels, weather, and topography, overall fire risk for the proposed Facility would be moderate.
- Groundwater: indicated to be from 16 to 527 feet below ground surface and generally within the basalt bedrock based on a search of water wells located in the vicinity of the

Facility site boundary; the majority of well records report water depths of greater than 100 feet (OWRD 2025).

- Lateral spreading: The lateral spreading risk within the Facility site boundary may be moderate to high along drainages. However, it is acknowledged that most of the area within the site boundary is flat and gentle sloping topography and the Facility components are sited to avoid drainages.
- Liquefaction: The potential for significant loss of strength of fine-grained materials and ensuing bearing failure or loss of lateral support during seismic shaking is considered to be low within the Facility site boundary. A liquefaction analysis was not performed and is not judged to be a concern.
- Subsidence: Subsidence due to a seismic event is highly unlikely in the site boundary as the overlying soils are shallow and unsaturated where the Facility will be constructed.
- Unstable or fragile soils: The geotechnical report included as Attachment B-2 to Exhibit B does not identify collapsible soils within the Facility site boundary.
- Wind erosion: The erodibility of the soil types within the site boundary by wind varies widely and ranges from slight among the stony soil types to moderate among the silty soil types (Table C-1 in Exhibit C).
- Water erosion: The erodibility of the soils by water within the site boundary ranges from slight among the stony soil types to moderate among the silty to sandy soil types (Table C-1 in Exhibit C).

As summarized above and detailed in Exhibits B and C, the risks posed by non-seismic geologic hazards listed above are generally considered low because the Facility can be designed to minimize or avoid these areas and the micrositing area minimizes geologic hazard areas. Therefore, it is assumed that the Facility components will not be built within County-identified hazard areas of the NH zone.

> *Policy III. Proposals for development on lands designated as flood prone areas shall be subject to the provisions of the National Flood Insurance Program and subsequent revisions thereof. Structures specifically designed to control soil erosion or store water shall be exempt from this policy.*

Response: Federal Emergency Management Agency (FEMA) National Flood Hazard data (FEMA 2025a) were compared to the temporary and permanent disturbance areas in the site boundary to evaluate flood hazards. Figure B-3 in Exhibit B provides a series of sheet maps of FEMA floodplains (FEMA 2025a). Additional DOGAMI floodplain mapping was not available (DOGAMI 2025b). There are 100-year floodplains mapped along Rosebush Creek in the middle of the site boundary (Figure B-3.4), along a tributary of the Deschutes River (Figure B-3.6), along a tributary of Rosebush Creek (Figure B-3.6), along a drainage toward Finnegan Creek (Figure B-3.9), and along Finnegan Creek (Figure B-3.10). Floodplain impacts are listed in Table B-3 of Exhibit B. The Facility would include 0.1 acres of permanent impacts from a fenceline and an access road; and temporary construction impacts of 0.7 acres including an access road, a fenceline, and collection lines.

Goal II. To protect life and property from natural disasters and hazards.

Policy II. Lands designated as potential natural hazard areas shall be evaluated by a competent authority prior to the initiation of construction of any permanent structure. The evaluation shall include base data and contain an analysis of the probable physical impacts of the proposed development. Such an evaluation shall be done at the expense of the developer. The County shall support and assist reasonable efforts to more explicitly define natural hazard areas. When such information becomes available it shall be incorporated into the Resource Document. If appropriate, goals and policies will be developed, adopted and integrated into the Comprehensive Plan.

Response: As described in response to SCZO 3.7 in Section 5.2.1.3 and echoed in response to Goal I Policy II of this section, applicable NH Combining Zone hazard areas are shown on Figure D-3 and analyzed in detail in Exhibits B and C. The response to SCZO 3.7, which summarizes the applicable analysis and findings from Exhibits B and C, is included below:

- Landslides: No mapped landslides are located within the Facility site boundary (Figure B-3 in Exhibit B).
- Earthquakes: The Facility site boundary is in an area of moderate to strong perceived shaking, very light to light potential damage, and slight damage to buildings for an earthquake that has a 2 percent chance of occurring within the next 50 years; a light to moderate perceived shaking, none to very light potential damage, and very slight damage to buildings for an magnitude 9.0 Cascadia earthquake; and a low to very low probability of damaging shaking over the next 50 years.
- Volcanic: The closest volcano to the site boundary is Mount Hood (approximately 37 miles west). In addition, a volcano hazard zone is located approximately 10 miles west/southwest of the site boundary along a drainage.
- Flooding: 100-year floodplains are mapped along drainages within the site boundary that will be avoided with construction and operation of the Facility (see Figures B-3.4, 3.6, 3.9, and 3.10 in Exhibit B).
- Wildfire: Due to the existing infrastructure, high burn probability, low expected intensity as measured by average flame length, fuels, weather, and topography, overall fire risk for the proposed Facility would be moderate.
- Groundwater: Indicated to be from 16 to 527 feet below ground surface and generally within the basalt bedrock based on a search of water wells located in the vicinity of the Facility site boundary; the majority of well records report water depths of greater than 100 feet (OWRD 2025).
- Lateral spreading: The lateral spreading risk within the Facility site boundary may be moderate to high along drainages. However, it is acknowledged that most of the area within the site boundary is flat and gentle sloping topography and the Facility components are sited to avoid drainages.
- Liquefaction: The potential for significant loss of strength of fine-grained materials and ensuing bearing failure or loss of lateral support during seismic shaking is considered to be

low within the Facility site boundary. A liquefaction analysis was not performed and is not judged to be a concern.

- Subsidence: Subsidence due to a seismic event is highly unlikely in the site boundary as the overlying soils are shallow and unsaturated where the Facility will be constructed.
- Unstable or fragile soils: The geotechnical report included as Attachment B-2 to Exhibit B does not identify collapsible soils within the Facility site boundary.
- Wind erosion: The erodibility of the soil types within the site boundary by wind varies widely and ranges from slight among the stony soil types to moderate among the silty soil types (Table C-1 in Exhibit C).
- Water erosion: The erodibility of the soils by water within the site boundary ranges from slight among the stony soil types to moderate among the silty to sandy soil types (Table C-1 in Exhibit C).

As summarized above and detailed in Exhibits B and C, the risks posed by non-seismic geologic hazards listed above are generally considered low because the Facility can be designed to minimize or avoid these areas and the micrositing area minimizes geologic hazard areas. Therefore, it is assumed that the Facility components will not be built within County-identified hazard areas of the NH zone,.

Goal VI. Encourage preservation of the rural nature the Sherman County landscape.

Response: The SCCP does not provide a description or definition of "rural nature." The term "rural" is generally understood to mean low population density areas with large acreage properties, dominated by agricultural, industrial, or resource businesses and may include homesites alongside the other uses (Merriam-Webster 2026, USDA 2026a). In Oregon, urban development is limited to areas within an urban growth boundary or within city limits. The Facility does not include the construction of any homes and would not result in the establishment of urban infrastructure such as a community or public water or sewer system. The majority of the Facility components are low-lying (under 20 feet tall) with taller structures being the 44 proposed wind turbines and the aboveground transmission lines and associated utility poles. As discussed in Sections 5.2.3.3 and 5.5.2.1, the Facility will not interfere seriously with accepted farming practices on adjacent lands devoted to farm use nor will it materially alter the overall land use pattern of the area.

Goal VII. Encourage preservation of fish and wildlife habitat in the County.

Goal VIII. Encourage the diversity of plant and animal species within the County.

Response: With respect to Goals VII and VIII, as discussed in Exhibit G, construction and operation of the Facility would result in both permanent and temporary impacts to wildlife and their habitats. Due to the multi-year construction schedule of the Facility, both permanent and temporary impacts to fish and wildlife habitat will occur in phases over this time period. Habitat mitigation, wildlife monitoring, and vegetation management associated with construction and operation are discussed in the Draft HMP (Attachment G-2 to Exhibit G), Draft Wildlife Monitoring and Mitigation Plan (Attachment G-3 to Exhibit G), and Draft Vegetation and Soil Management Plan (VSMP; Exhibit C,

Attachment C-2), respectively. The mitigation ratios proposed in the Draft HMP were established with input from ODFW.

Potential impacts on fish and wildlife habitat include the temporary and permanent disturbance to habitat associated with the construction and operation of the Facility. Permanent disturbance areas are those that would be converted from the existing condition to a different condition for the life of the Facility, including within the fenced solar array areas where vegetation may not necessarily be disturbed but the habitat will no longer be available to mule deer and other big game. Temporary impact areas are those areas that would be disturbed during construction activities but would not become permanent parts of the Facility. The acres of temporary and permanent disturbances to wildlife habitat, organized by habitat category, type, and subtype, are summarized in Table G-7 in Exhibit G. Impacts that cannot be avoided will be mitigated as described in the Draft HMP (Attachment G-2 to Exhibit G). The mitigation ratios proposed in the Draft HMP were established with input from ODFW. Impacts to state sensitive species are described in Section 8.2 of Exhibit G.

A wetland delineation was performed for the micrositing area (see Exhibit O1). This assessment determined construction and operation of the Facility are not anticipated to adversely affect jurisdictional waters of the U.S. or waters of the state. Permanent impacts to jurisdictional wetlands and waters have been intentionally avoided. Minor temporary impacts are proposed during construction. The temporary impacts to jurisdictional waters of the U.S. will be permitted under existing nationwide permits, and temporary impacts to jurisdictional waters of the state will be permitted through Removal-Fill Permit/Authorization with the Oregon Department of State Lands.

Some impacts will be avoided or minimized through measures implemented during Facility design, construction, and operation; environmental training provided to construction and operation staff; and implementation of avoidance and minimization measures – these avoidance and mitigation measures are described in detail in Section 9.0 of Exhibit G. After construction of the Facility, the Applicant will revegetate non-agricultural portions of the site, as described in the Draft VSMP (Exhibit C, Attachment C-2). Revegetation of cultivated agricultural areas will be coordinated with the appropriate landowner and/or farmer. Additionally, noxious weed spread and negative impacts to habitats within or adjacent to the Facility site boundary will be minimized through implementation of weed management strategies during construction and operation.

By implementing these measures, the Applicant has appropriately preserved fish and wildlife habitat, and diversity of plant and animal species within the county.

5.4.3 Social Characteristics – Section XII

Goal I. To improve or maintain the current level of social services available with the County and to assure the provision of public facilities consistent with the intensity of land use.

> *Policy I. To improve or maintain the current level of social services available with the County and to assure the provision of public facilities consistent with the intensity of land use. The County Court shall encourage the location of industries, businesses and commercial services to*

diversify activities within the County consistent with the desired population growth and other goals and policies.

Policy II. The County Court shall continue to cooperate with the school districts to assure the provision of educational facilities in an efficient manner consistent with the demands of the Sherman County populace.

Policy IV. The County road system shall be maintained and improved consistent with the needs of the Sherman County citizenry, when funds are available. It shall be the policy of the County Court to maintain school bus routes. Further oiling and graveling of existing roads shall be undertaken to provide the greatest benefit to the greatest number of rural residents.

Response: These policies are directives to Sherman County that do not directly apply to the Applicant. In any event, the Facility is not anticipated to cause a significant demand on public services within Sherman County. As described above and in Exhibit L, there are adequate public services and providers available within Sherman County to accommodate the influx of employees during construction of the Facility. Existing public roads that will be utilized during construction of the Facility will be improved to their original condition after construction if damage occurs.

As discussed in detail in the TIS (Attachment L-2 of Exhibit L), the Facility will have the largest impact on local roadways and road users during construction. Construction worker and truck traffic would be concentrated on US-97 to reach the vicinity of the Facility, then be dispersed throughout the local road network surrounding and to the south of Grass Valley. Some traffic slowdowns may be seen on US-97 and other local roads during the peak of construction. Some traffic could also arrive from the south via US-97, OR-216, and US-197. Oversize loads would only use the roads described and shown in Figure 3 of Attachment L-2 (Exhibit L) for access to the Facility parcels, with several roadway modifications for both turning radius and alignment alternatives proposed to make the routes passable and safe. The BMPs described in Section 5.2 of the TIS (Attachment L-2 of Exhibit L) would be utilized to prevent negative impacts on existing road users or County operations. After construction is complete, minimal operations staff are required to operate the Facility and impacts on traffic would be negligible.

Policy IX. The continuing loss of economic opportunities for residents of the County is of great concern to the residents. The reduction of need for agricultural based jobs due to improved farming technology and practices, the inability to keep families employed or offer employment opportunities to attract new citizens or the children of existing residents results in a stagnant or declining population. It is a matter of great urgency that the Court gives increased consideration to land use applications, which will increase economic diversity and employment opportunities. This increased consideration shall not be made to the detriment of existing residential structures. This consideration should focus on long-term job creation and should not be used as a means to allow residential and commercial uses to locate outside urban growth and rural service center (communities) boundaries.

Response: This policy reflects the economic challenges facing Sherman County and the importance of diversifying its local economic base. As discussed elsewhere in this exhibit, agriculture is the

defining component of the economy in Sherman County but as noted in this policy, there has been a reduction in need for agriculturally based jobs due to improved farming technology and practices. Sherman County has experienced a decline in population and challenges in attracting new residents and retaining children of existing residents. Sherman County has over a decade of history of diversifying its economic base through the approval, construction, and operation of renewable energy facilities. Tax payments from renewable energy projects have increased tax revenue in Sherman County and supported public sector programs such as police, fire protection, roads, weed control, schools, which are important to supporting and retaining existing residents and attracting new ones.

As evident from the analysis in Attachment D-2, the Facility will continue to diversify Sherman County's local economic base through the addition of construction, maintenance, and renewable energy industry-specific jobs, through direct and indirect local economic benefits from construction and operational spending, through sizable tax payments and community service fees, and through financial compensation to landowners through commercial contracts, which can provide a stable source of income over a period of many years for farmers and ranchers. The Facility operations are expected to directly employ approximately 20 full-time workers residing within the local area, with aggregate wages and benefits estimated at approximately $2.2 million annually. During construction, employees will purchase goods and supplies, stay in area hotels, and eat at local restaurants. Each of these actions will benefit the local and regional economy by supporting area businesses. Development of the Facility will increase annual property tax revenue to Sherman County, which will increase the County's ability to provide roadways, police protection, fire protection and emergency response, and other services to its citizens. More details regarding the economic benefits of the Facility are provided in Section 5.7.1.2.

The Applicant plans to increase economic diversity and employment opportunity in the ways outlined above through construction and operation of the Facility, without undermining the viability of the agricultural sector. The Applicant has completed an Agricultural Impact Analysis and an Economic Impact Analysis, included herein as Attachments D-1 and D-2, respectively. Additionally, the applicable agricultural mitigation strategies are outlined in Section 3.4 of this exhibit. Therefore, the Facility is consistent with this policy.

Goal II. To protect historical, cultural and archeological resources from encroachment by incompatible land uses and vandalism.

Policy XI. The following areas and structures shall be considered historically, archaeologically, or culturally significant: all archeological sites; the Sherman County Courthouse; portions of the Old Oregon Trail which are visible and pass over rangeland; and the old Union Pacific Railroad bed through DeMoss Park.

Policy XII. The County Court shall encourage the preservation of these archaeologically or culturally significant areas. Landowners will be encouraged to provide long-term protection to these areas.

Response: The Sherman County Courthouse and the old Union Pacific Railroad bed through DeMoss Park are not located within the Facility site boundary or analysis area. A portion of the Barlow Cutoff Trail, considered part of the Oregon National Historic Trail, intersects the Facility site boundary. A cultural resource survey and report for the Facility have been completed and are discussed in detail in Exhibit J – Historic, Cultural, and Archaeological Resources. Additionally, as discussed in Exhibit J and Exhibit K –Recreation, the closest high-potential site/segment of the Barlow Cutoff is the Tygh Valley high-potential site, which is located 15.2 miles southwest of the analysis area. Thus, the Barlow Cutoff is not considered to be a high-potential site or segment.

Facility components will be sited outside any archaeological sites found within the micrositing area that are recommended for National Register of Historic Places (NRHP) listing or deemed a NRHP-eligible cultural resource. If avoidance is not practicable in the final design, any significant resources (i.e., NRHP-eligible or unevaluated resources) will be mitigated to reduce impacts to a status of less than significant. Therefore, the Facility is consistent with Policies XI and XII.

5.4.4 Economics – Section XIV

Goal I. Diversify the economic base of the County and maintain the viability of the agricultural sector.

> *Policy II. Appropriate provisions shall be incorporated into the zoning, subdivision and other necessary ordinances to assure conservation and retention of agricultural lands in agricultural uses. At a minimum, agricultural lands shall be zoned as exclusive farm use and taxed accordingly.*

Response: As discussed in detail above, in response to Policy IX in Section 5.4.3, the Facility will diversify the local economic base through the addition of construction, maintenance, and renewable energy industry-specific jobs without undermining the viability of the agricultural sector. The Facility is located entirely on F-1 (EFU) zoned land. The Applicant has completed an Agricultural Impact Analysis and an Economic Impact Analysis, included as Attachment D-1 and D-2 (respectively) and Section 3.4 of this exhibit outlines the applicable agricultural mitigation strategy. Additionally, as discussed in the Agricultural Investment Plan (Attachment D-3), the Applicant proposes to pay, prior to construction, $976 per acre for each acre the Solar Facility removes from wheat production and place this funding into the Speedway Agricultural Investment Fund account that will be managed by the MCEDD in partnership with Sherman County.

5.4.5 Energy – Section XV

Goal I. Conserve energy resources.

> *Policy I. Cooperate with public agencies and private individuals in the use and development of renewable resources.*

Response: As discussed above and in detail in the Background Information Exhibit, the Facility contains solar, wind, and BESS components, and is therefore a renewable energy facility. The energy produced by the solar and wind components will be stored by the BESS components (when needed) and transported to the regional electric grid via the 500-kV gen-tie transmission line to the

new BPA switchyard. Collectively the Facility supports this goal and policy because it is a renewable energy facility that will supply renewable resources to the grid and be made available for public use.

5.4.6 Land Use – Section XVI

Goal I. To provide an orderly and efficient use of lands within Sherman County.

Response: Commercial utility facilities may be authorized as a conditional use in the F-1 zone, pursuant to SCZO 3.1.3, and utility facilities necessary for public service are allowed in the F-1 (EFU) zone in accordance with ORS 215.283(1)(c). Additionally, OAR 660-033-0130(37) and (38) expressly list a wind power generation facility and a photovoltaic solar power generation facility, respectively, as uses that may be allowed in exclusive farm use designated land as a conditional use. The Facility will be compatible with adjacent agricultural activities. For all these reasons, the Facility is compatible with the County's orderly and efficient use of lands under this goal.

5.5 Directly Applicable Rules, Statutes, and Goals– OAR 345-022-0030(7)(b)(C)(iii)

> *(iii) Identify all Land Conservation and Development Commission administrative rules, statewide planning goals and land use statutes directly applicable to the facility under ORS 197.646(3) and describe how the proposed facility complies with those rules, goals and statutes;*

5.5.1 Oregon Revised Statutes (ORS)

5.5.1.1 ORS 215.274

(1) As used in this section, "associated transmission line" has the meaning given that term in ORS 469.300.

> *ORS 469.300(3) "Associated transmission lines" means new transmission lines constructed to connect an energy facility to the first point of junction of such transmission line or lines with either a power distribution system or an interconnected primary transmission system or both or to the Northwest Power Grid.*

Response: The Facility includes a 500-kV gen-tie transmission line of less than 650 linear feet that will connect the Facility's central substation to the BPA switchyard POI. As a result, the proposed 500-kV gen-tie transmission line meets the definition of "associated transmission lines" provided by ORS 469.300 and is subject to the standards of ORS 215.274(2); see findings below.

> *(2) An associated transmission line is necessary for public service if an applicant for approval under ORS 215.213 (1)(c)(B) or 215.283 (1)(c)(B) demonstrates to the governing body of a county or its designee that the associated transmission line meets:*
>
> > *(a) At least one of the requirements listed in subsection (3) of this section; or*

(b) The requirements described in subsection (4) of this section.

Response: The proposed 500-kV gen-tie transmission line meets the requirements of ORS 215.274(4). Therefore, the standards referenced in ORS 215.274(2)(b) above will be met. See below for responses to the criteria of ORS 215.274(4).

(4)(a) Except as provided in subsection (3) of this section, the governing body of a county or its designee shall approve an application under this section if, after an evaluation of reasonable alternatives, the applicant demonstrates that the entire route of the associated transmission line meets, subject to paragraphs (b) and (c) of this subsection, two or more of the following factors:

(A) Technical and engineering feasibility;

(B) The associated transmission line is locationally dependent because the associated transmission line must cross high-value farmland, as defined in ORS 195.300, or arable land to achieve a reasonably direct route or to meet unique geographical needs that cannot be satisfied on other lands;

(C) Lack of an available existing right of way for a linear facility, such as a transmission line, road or railroad, that is located above the surface of the ground;

(D) Public health and safety; or

(E) Other requirements of state or federal agencies.

Response: The proposed 500-kV gen-tie transmission line meets the standards of ORS 215.274(4)(a)(B) and (C) as it is locationally dependent on the locations of the Facility's central substation to the BPA switchyard POI, there is no way to avoid crossing arable land, and there are no available rights-of-way that exist between these two locations. Due to the need for the gen-tie transmission line to connect the substation and switchyard, no other locations are reasonable alternatives. Other alternative locations would require a longer gen-tie line, which would be more disruptive and impactful to the farmlands nearby. There is no existing available right-of-way directly connecting the collector substation to the POI. Due to compliance with ORS 215.274(4)(a)(B) and (C), this standard is met.

(b) The applicant shall present findings to the governing body of the county or its designee on how the applicant will mitigate and minimize the impacts, if any, of the associated transmission line on surrounding lands devoted to farm use in order to prevent a significant change in accepted farm practices or a significant increase in the cost of farm practices on the surrounding farmland.

Response: The proposed 500-kV gen-tie transmission line is less than 1,000 feet long and will be surrounded by the Facility. Given the short length of the gen-tie line and the minimal permanent footprint its transmission towers would have on the land, it would have minimal impacts on the surrounding farmland. Even when considered in context to the entire Facility, it will not result in significant changes in accepted farm practices or significant increase in the cost of farm practices on

the surrounding farmland as determined by the Facility's surrounding lands analysis in Section 5.5.2.1. As a result, this standard is met.

> *(c) The governing body of a county or its designee may consider costs associated with any of the factors listed in paragraph (a) of this subsection, but consideration of cost may not be the only consideration in determining whether the associated transmission line is necessary for public service.*

Response: As provided above, the primary factors for the location of the associated transmission line are locational dependency and a lack of an available existing right-of-way. Costs are not the only consideration. As a result, this standard is met.

5.5.1.2 ORS 215.275

> *(1) A utility facility established under ORS 215.213 (1)(c)(A) or 215.283 (1)(c)(A) is necessary for public service if the facility must be sited in an exclusive farm use zone in order to provide the service.*
>
> *(2) To demonstrate that a utility facility is necessary, an applicant for approval under ORS 215.213 (1)(c)(A) or 215.283 (1)(c)(A) must show that reasonable alternatives have been considered and that the facility must be sited in an exclusive farm use zone due to one or more of the following factors:*

Response: As described above in Section 5.2.1, the aboveground 230-kV collector lines connecting the six collector substations to the central substation falls under the utility facility necessary for public service use category provided by 215.283(1)(c)(A).

The Facility is located entirely within the EFU zone. As the aboveground 230-kV collector lines connect Facility components to one another, there are no reasonable alternatives on non-EFU zoned land available for these collector lines. As a result, one or more of the following factors are addressed below.

> *(a) Technical and engineering feasibility;*
>
> *(b) The proposed facility is locationally dependent. A utility facility is locationally dependent if it must cross land in one or more areas zoned for exclusive farm use in order to achieve a reasonably direct route or to meet unique geographical needs that cannot be satisfied on other lands;*
>
> *(c) Lack of available urban and nonresource lands;*
>
> *(d) Availability of existing rights of way;*
>
> *(e) Public health and safety; and*
>
> *(f) Other requirements of state or federal agencies.*

Response: The purpose of the aboveground 230-kV collector lines is to transfer power from the six collector substations to the central substation, which then transfers power to the regional grid at

the new BPA switchyard via the 500-kV gen-tie transmission line. As a result, the aboveground 230-kV collector lines are locationally dependent due to the locations of the central substation and six collector substations. There are no urban and nonresource lands available within the Facility site boundary on which the aboveground 230-kV collector lines could be sited. As a result, the aboveground 230-kV collector lines must be sited in an exclusive farm use zone due to ORS 215.275(2)(b) and (c). This standard is met.

(3) Costs associated with any of the factors listed in subsection (2) of this section may be considered, but cost alone may not be the only consideration in determining that a utility facility is necessary for public service. Land costs shall not be included when considering alternative locations for substantially similar utility facilities. The Land Conservation and Development Commission shall determine by rule how land costs may be considered when evaluating the siting of utility facilities that are not substantially similar.

Response: Cost alone was not the only consideration in determining that a utility facility is necessary for public service. As stated above, the 230-kV collector lines must be sited in an exclusive farm use zone due to ORS 215.275(2)(b) and (c), which are not cost-related factors.

> *(4) The owner of a utility facility approved under ORS 215.213 (1)(c)(A) or 215.283 (1)(c)(A) shall be responsible for restoring, as nearly as possible, to its former condition any agricultural land and associated improvements that are damaged or otherwise disturbed by the siting, maintenance, repair or reconstruction of the facility. Nothing in this section shall prevent the owner of the utility facility from requiring a bond or other security from a contractor or otherwise imposing on a contractor the responsibility for restoration.*

Response: The Applicant acknowledges responsibility for restoring, as nearly as possible, to its former condition any agricultural land and associated improvements that are damaged or otherwise disturbed by the siting, maintenance, repair, or reconstruction of the Facility. Exhibit F describes Facility retirement methodology and the financial assurance details for supporting Facility retirement. The Applicant also acknowledges the option for the Facility owner to require a bond or other financial security from a contractor or otherwise imposing on a contractor the responsibility for restoration as needed.

> *(5) The governing body of the county or its designee shall impose clear and objective conditions on an application for utility facility siting under ORS 215.213 (1)(c)(A) or 215.283 (1)(c)(A) to mitigate and minimize the impacts of the proposed facility, if any, on surrounding lands devoted to farm use in order to prevent a significant change in accepted farm practices or a significant increase in the cost of farm practices on the surrounding farmlands.*

Response: The aboveground 230-kV collector lines will be surrounded by the Facility. As a result, the Applicant has included the surroundings lands analysis for the associated transmission line with the surrounding lands analysis for the Facility. Impacts to surrounding lands are assessed for the Facility in Section 5.5.2.1 below. The analysis concludes that the Facility will not result in a significant change in accepted farm practices or a significant increase in the cost of farm practices on the surrounding farmland. As a result, this standard is met.

(6) The provisions of subsections (2) to (5) of this section do not apply to interstate natural gas pipelines and associated facilities authorized by and subject to regulation by the Federal Energy Regulatory Commission.

Response: The Facility does not consist of an interstate natural gas pipelines or associated facilities. The subsections of (2) to (5) have been addressed above. This standard is met.

5.5.1.3 ORS 215.296

Standards for approval of certain uses in exclusive farm use zones; violation of standards; complaint; penalties; exceptions to standards.

(1) A use allowed under ORS 215.213 (2) or (11) or 215.283 (2) or (4) may be approved only where the local governing body or its designee finds that the use will not:

(a) Force a significant change in accepted farm or forest practices on surrounding lands devoted to farm or forest use; or

(b) Significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use

Response: The Facility is being permitted through EFSC for a site certificate. See response to OAR 660-033-0130(5), below in Section 5.5.2.1 of this exhibit, as the standards are identical. The Applicant acknowledges the procedural standards set forth in ORS 215.296(2)-(10).

5.5.2 Oregon Administrative Rules (OAR)

5.5.2.1 OAR 660-033-0130(5)

Minimum Standards Applicable to the Schedule of Permitted and Conditional Uses

(5) Approval requires review by the governing body or its designate under ORS 215.296. Uses may be approved only where such uses:

(a) Will not force a significant change in accepted farm or forest practices on surrounding lands devoted to farm or forest use; and

(b) Will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use.

(c) For purposes of subsection (a) and (b), a determination of forcing a significant change in accepted farm or forest practices on surrounding lands devoted to farm and forest use or a determination of whether the use will significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use requires:

(A) Identification and description of the surrounding lands, the farm and forest operations on those lands, and the accepted farm practices on each farm operation and the accepted forest practices on each forest operation;

(B) An assessment of the individual impacts to each farm and forest practice, and whether the proposed use is likely to have an important influence or effect on any of those practices; and

(C) An assessment of whether all identified impacts of the proposed use when considered together could have a significant impact to any farm or forest operation in the surrounding area in a manner that is likely to have an important influence or effect on that operation.

(D) For purposes of this subsection, examples of potential impacts for consideration may include but are not limited to traffic, water availability and delivery, introduction of weeds or pests, damage to crops or livestock, litter, trespass, reduction in crop yields, or flooding.

(E) For purposes of subsection (a) and (b), potential impacts to farm and forest practices or the cost of farm and forest practices, impacts relating to the construction or installation of the proposed use shall be deemed part of the use itself for the purpose of conducting a review under subsections (a) and (b).

(F) In the consideration of potentially mitigating conditions of approval under ORS 215.296(2), the governing body may not impose such a condition upon the owner of the affected farm or forest land or on such land itself, nor compel said owner to accept payment to compensate for the significant changes or significant increases in costs described in subsection (a) and (b).

Response:

Surrounding Lands, Farm Operations and Farm Practices [OAR 660-033-0130(5)(c), (c)(A)]

For the purposes of evaluating OAR 660-033-0130(5)(c), "surrounding lands" are equivalent to the land use analysis area, meaning the parcels (or portions of parcels) within Sherman County and immediately adjacent to the proposed Facility site boundary and within 0.5 miles of this boundary (referred to herein as "surrounding lands" and shown on Figure D-11 as the "Analysis Area"). No forest practices or forest operations exist within the surrounding lands; therefore, compliance with OAR 660-033-0130(5) includes an evaluation of only farm operations and farming practices. "Accepted farming practices" is defined by ORS 215.203(2)(c) as "a mode of operation that is common to farms of a similar nature, necessary for the operation of such farms to obtain a profit in money and customarily utilized in conjunction with farm use."

Determination of farming practices within the surrounding lands was informed through landowner surveys and aerial imagery (Figure D-11, Table D-9; Google Earth 2026). As described below, the surrounding lands consist of a combination of cultivated lands (consisting of dryland wheat fields and other row crops and pasture) as identified during habitat field surveys (see Exhibit G for further information on habitat survey extent and results), uncultivated lands, and urban and mixed environs lands. In areas that were not obviously managed for crop cultivation or contained

structures, the Applicant has identified that land as "uncultivated land."[12] Cultivated lands are shown on Figure D-11. The accepted farm practices within the surrounding lands primarily consist of dryland wheat crop cultivation and irrigated wheat crop cultivation. Most parcels within the surrounding lands have large swaths of uncultivated land. A list of landowners within surrounding lands and a description of the accepted farming practices occurring on these lands (as well as other existing land uses) is provided in Table D-9 below.

Table D-9. Farm Practices and Other Land Uses within Surrounding Lands

Owner	Map and Tax Lot	Acreage within Surrounding Lands*	Farm Practices and Other Land Uses within Surrounding Lands*
ARLONE A STRADLEY TRUST	02S16E00004400	103.1	Uncultivated land and dryland wheat or similar crop cultivation. Transmission line infrastructure and farm structures present.
	02S16E00004500	311.2	
	02S17E00003500	317.5	
	02S17E00003600	319.1	
	03S16E0000500	306.7	
BARNUM, RICHARD	02S17E00001500	479.6	Uncultivated land and dryland wheat crop cultivation or similar.
	02S17E00003400	122.6	
BELSHE, JAMES R & JERRINE A	02S17E0000500	155.2	Uncultivated land and dryland wheat crop cultivation or similar. Farm structures present.
	02S17E0000800	297.4	
BERGE, JAMES C ETAL	04S16E00001100	12.8	Appears to be uncultivated.
BIRD FAMILY TRUST	02S16E00003400	311.5	Dryland wheat crop cultivation or similar and uncultivated land. Farming equipment present.
	02S16E00005000	455.2	Dryland wheat crop cultivation or similar and uncultivated land. Cell tower present.
BIRD, PAUL & LYNN	02S16E2600201	13.7	Primarily uncultivated land.
BLACKBURN, GARY L ETAL	02S17E00001900	308.3	Dryland wheat crop cultivation or similar and small areas of uncultivated land.
BLAGG, KYLE J	02S17E00004601	5.7	Homesite with farm structures present, adjacent to dryland wheat crop cultivation or similar.
BLAIR, PHILIP J & NETTIE L	02S17E00001800	2.0	Uncultivated land and dryland wheat crop cultivation or similar.
BROWN KRISTINE, WEIS, NICHOLAS	03S16E0200401	10.0	Homesite with farm structures present.
BROWN, JAMES E	04S16E00001000	52.9	Uncultivated land with transmission line structures.
	04S16E00001200	41.6	
	04S16E00001600	749.9	

[12] Uncultivated lands include grasslands, waters, wetlands, riparian land, grasslands, shrubland, and shrub-steppe habitat.

Owner	Map and Tax Lot	Acreage within Surrounding Lands*	Farm Practices and Other Land Uses within Surrounding Lands*
CHRISTIANSEN, KATHERINE J	03S15E00002200	36.4	Homesite with farm equipment present and surrounded by uncultivated land.
	03S15E0000700	207.2	
	03S16E00002600	199.1	
CHRISTIANSEN, KATHERINE JANE	03S15E00002300	39.6	Uncultivated land.
COELSCH, LEO W	01S17E00007900	53.0	Uncultivated land with a small area of irrigated crop cultivation. Farm structure present. Water right: Cert:83181 OR * IR
	01S17E00008000	233.2	Uncultivated land.
	02S17E00001100	285.4	
COELSCH, LEO W & KRISTA	02S17E00001101	164.3	Primarily uncultivated land, irrigated crop cultivation. Farming operation and associated structures, possible livestock operation. Water right: Cert:83181 OR * IR
D.L.L. TRUST	04S16E0000300	284.1	Uncultivated land.
	04S16E0000400	9.1	Uncultivated land.
DEGRANGE, MICHAEL & AMBER	02S17E00002701	7.3	Homesite with farm structures present.
EAKIN, BRAD & STACY	03S16E0000600	110.7	Dryland wheat crop cultivation or similar with a small area of uncultivated land and equipment.
	03S17E00003500	122.7	Dryland wheat crop cultivation or similar with small areas of uncultivated land.
EAKIN, BRAD T & STACY JO	03S17E00004300	158.0	Dryland wheat crop cultivation or similar and uncultivated land.
EARL RANCH LLC	03S17E00001000	2.4	Uncultivated land.
FEDERAL GOVERNMENT	04S16E00001500	39.9	Uncultivated land.
	04S16E0000700	2.7	Uncultivated land.
	04S16E0000800	37.5	Uncultivated land.
GALLEY, JOHN & J DIANE TRUST	03S16E00004100	153.9	Uncultivated land.
GRASS VALLEY, CITY	02S16E00004800	1.6	Dryland wheat crop cultivation or similar, equipment, and dumpsters.
GV PROPERTY DEVELOPMENT LLC	02S16E2600500	6.1	Dryland wheat crop cultivation or similar.
HANLON, GERARD A	02S17E0000901	9.0	Homesite surrounded by uncultivated land.
HART, DARRYL & TERESA	02S17E0000301	361.1	Dryland wheat crop cultivation or similar and uncultivated land.

Owner	Map and Tax Lot	Acreage within Surrounding Lands*	Farm Practices and Other Land Uses within Surrounding Lands*
HART, DARRYL R	02S17E00002600	153.7	Dryland wheat crop cultivation or similar and uncultivated land.
HATTRUP FAMILY LLC	04S17E0000600	307.9	Dryland wheat crop cultivation or similar and uncultivated land.
HECTOR, ELLEN TRUSTEE	03S16E00002400	473.1	Homesite with farm structures and surrounded by dryland wheat crop cultivation or similar and uncultivated land.
HELEN OLDS RANCH LLC	02S17E00005500	838.4	Dryland wheat crop cultivation or similar and uncultivated land. Farm structures present.
JOHNSON, SUSANNA & JOEL	03S17E00003801	58.1	Farm operation with dryland wheat crop cultivation or similar and uncultivated land.
JUSTESEN, FRED & JON	03S15E00002800	76.9	Uncultivated land.
JUSTESEN, FRED, JONNIE, EVELYN	03S15E00002400	159.4	Uncultivated land.
JUSTESEN, JON & FRED	04S16E00001601	1.9	Uncultivated land.
JUSTESEN, TATE	03S17E00002700	117.0	Uncultivated land with transmission line infrastructure present.
	03S17E00002800	292.8	Uncultivated land.
KOCK FARMS LLC	02S17E00005100	159.5	Homesite surrounded by dryland wheat crop cultivation or similar and small areas of uncultivated land.
KOCK, JULIA O'HARA	03S17E00001100	600.0	Dryland wheat crop cultivation or similar and uncultivated land. Transmission line infrastructure present.
LEMLEY, RANDY	03S16E0000900	469.4	Homesite with farm structures and surrounded by uncultivated land.
LONG, SUSAN K & WILFORD C TRST	02S17E00004100	314.0	Dryland wheat crop cultivation or similar and areas of uncultivated land. Transmission line infrastructure present.
	02S17E00004300	153.5	Dryland wheat crop cultivation or similar and uncultivated land.
MARTIN, AUSTEN	02S17E0000601	4.6	Homesite and farm structures.
MICHIGAN CEMETERY ASSN	03S16E00002300	2.4	Uncultivated land
MILLER, JUSTIN D & CHARLES E	03S17E00003700	17.3	Farm structures and equipment present.
MOORE, CHRISTOPHER & PATTI	02S17E00003000	568.3	Dryland wheat crop cultivation or similar and uncultivated land.
NOGLE, PAT	03S16E00003501	53.1	Uncultivated land and likely a livestock pen present.
NOGLE, PAT & NOGLE, WHITNEY	03S16E00003500	1007.2	Uncultivated land with farm structures, livestock pen, and transmission line infrastructure present.

Owner	Map and Tax Lot	Acreage within Surrounding Lands*	Farm Practices and Other Land Uses within Surrounding Lands*
Olsen Properties LLC	01S17E00008100	125.6	Dryland wheat crop cultivation or similar and uncultivated land.
	02S17E0000900	341.7	Dryland wheat crop cultivation or similar and uncultivated land.
PACIFIC MOTORSPORTS MGMT LLC	02S17E00005200	295.3	Dryland wheat crop cultivation or similar, uncultivated land, and Oregon Raceway Park and structures present. Water right: Permit: G 17083 * IR
PADGET, DARREN D & BRENDA J	03S17E0000600	275.3	Homesite surrounded by dryland wheat crop cultivation or similar and uncultivated lands.
PADGET, G DALE & DEANNA D TRST	02S17E00004500	466.8	Homesite and farming operation with dryland wheat crop cultivation or similar and uncultivated lands.
	03S17E00003600	311.3	Dryland wheat crop cultivation or similar and uncultivated lands.
	03S17E0000400	141.5	Dryland wheat crop cultivation or similar and uncultivated lands. Livestock pen present.
RICHARDS CORPORATION	03S15E00002900	50.3	Uncultivated land.
	03S16E00004000	315.1	Uncultivated land.
ROLFE, FRED M & NANCY	02S16E2600200	101.2	Dryland wheat crop cultivation or similar and uncultivated lands.
ROLFE, JOHNATHAN	03S16E00003300	310.0	Dryland wheat crop cultivation or similar and uncultivated lands.
	03S17E00003800	381.9	Dryland wheat crop cultivation or similar and uncultivated lands. Transmission line infrastructure present.
ROLFE, JOHNATHAN & KALIE	03S17E00004400	158.0	Dryland wheat crop cultivation or similar and uncultivated lands.
	04S17E0000400	14.7	Dryland wheat crop cultivation or similar and uncultivated lands.
	04S17E0000500	418.0	Homesite with farm structures and livestock pen. Dryland wheat crop cultivation or similar and uncultivated lands.
RUGGLES, CATHERINE	03S16E00003802	7.2	Homesite on uncultivated land.
RUGGLES, JESSE DEAN	04S16E0000900	3.5	Uncultivated land.
RUGGLES, JESSE DEAN	03S16E00003801	27.2	Homesite on uncultivated land.
	03S16E00004300	57.3	Uncultivated land.
	04S16E0000200	25.1	Uncultivated land.
	04S16E0000500	44.8	Uncultivated land.

Owner	Map and Tax Lot	Acreage within Surrounding Lands*	Farm Practices and Other Land Uses within Surrounding Lands*
	04S16E0000600	162.3	Uncultivated land.
RUGGLES, PHIL	02S16E2600600	1.1	Dryland wheat crop cultivation or similar and uncultivated lands.
SCHILLING RANCH, LLC	03S16E00001600	429.5	Dryland wheat crop cultivation or similar and uncultivated lands.
	03S16E00002500	239.0	Dryland wheat crop cultivation or similar and uncultivated lands.
SODERLUND, CHRISTOPHER	02S17E0000400	198.7	Dryland wheat crop cultivation or similar and uncultivated lands.
SOUTH SHERMAN FIRE DEPARTMENT	02S16E00005001	3.0	Dryland wheat crop cultivation or similar and uncultivated lands.
STATE OF OREGON	03S16E00002000	11.2	Uncultivated land with a dirt pile present.
	03S17E00004000	23.0	Uncultivated lands.
STRADLEY, LARA	03S16E0000501	5.0	Primarily uncultivated land with a small area of dryland wheat crop cultivation or similar. Farm operation structure present.
SUSI, SCOTT & TONYA	03S16E0200200	13.6	Homesite on uncultivated lands.
TRIMBLE FARMS LLC	03S16E0000100	317.9	Dryland wheat crop cultivation or similar and uncultivated lands.
	03S16E00001400	306.2	Homesite with farm structures. Dryland wheat crop cultivation or similar and uncultivated lands.
	03S17E00001200	121.8	Dryland wheat crop cultivation or similar and uncultivated lands.
VON BORSTEL, ALAN W	04S17E0000700	281.3	Dryland wheat crop cultivation or similar and uncultivated lands.
VON BORSTEL, LEE A	03S17E0000901	125.1	Dryland wheat crop cultivation or similar and uncultivated lands.
VON BORSTEL, PATRICIA TRUST	03S16E00002100	626.8	Dryland wheat crop cultivation or similar and uncultivated lands.
VON BORSTEL, STUART J & CAROL	04S16E0000100	122.2	Dryland wheat crop cultivation or similar and uncultivated lands.
WHEELER, MICK S.	03S17E0000500	122.4	Dryland wheat crop cultivation or similar and uncultivated lands. Farm structures present.
ZIEGLER FARMS LLC	02S17E00005600	79.7	Dryland wheat crop cultivation or similar
	03S17E0000700	145.4	Dryland wheat crop cultivation or similar and uncultivated lands.
Total Acreage within Surrounding Lands*		**20,343.8**	

Potential Impacts to Farm Practices During Facility Construction and Operation [OAR 660-033-0130(5)(c)(B),(D)&(E)]

The following paragraphs address the potential impacts listed in OAR 660-033-0130(5)(c)(D) that may result from construction and operation of the Facility (as required by OAR 660-033-0130(5)(c)(E)).

As provided by OAR 660-033-0130(5)(c)(D), typical interference or potential adverse impacts to the accepted farming practices in the surrounding area that may occur during Facility construction include traffic, water availability and delivery, introduction of weeds or pests, damage to crops or livestock, litter and trespass, reduction in crop yields, or flooding. Potential impacts related to wildfire are also evaluated in this section although not listed in OAR 660-033-0130(5)(c)(D). Below is an evaluation of whether these potential impacts rise to the level of significant and demonstrates that the Facility will be made compatible with other adjacent uses through the implementation of BMPs and mitigation measures and will not result in significant impacts to farming practices on surrounding lands.

Traffic and Adjacent Access

As discussed in Section 5.2.2.3 of this exhibit, traffic is anticipated to increase during construction due to the number of trucks and workers needed for Facility construction. The Applicant is actively coordinating with the County Roadmaster and a draft Road Use Agreement that includes input from the County Roadmaster and demonstrates compliance with the appliable provisions of the SCZO and Sherman County Transportation System Plan is included as Attachment L-4 to Exhibit L. As discussed in Exhibit L, the Applicant's contractor will provide advance notification to adjacent landowners and farmers through mailings, informal meetings, open houses or other similar methods when construction takes place in the vicinity of their homes and farms to help minimize access disruptions. The Applicant's contractor will specify timing of deliveries of heavy equipment and building materials to the extent feasible. With the mitigation measures identified in the Road Use Agreement, in addition to communication with the landowners, the temporary increase in traffic during construction should not interfere with agricultural activities.

Traffic will be significantly less during operation than during construction. It is estimated that up to 20 permanent employees will be hired to operate and maintain the Facility. Operational trips include employees traveling to work in their personal vehicles, as well as specialized personnel required for periodic inspections of Facility components who may travel in light-duty trucks. The occasional delivery truck may also access the site during operations. Due to the small number of permanent employees, there will not be significant increases in traffic in the surrounding lands.

Water Availability and Delivery

As shown on Figure D-11, there are two irrigation water rights within the surrounding lands. Certificate 83181 OR * IR appears to be used for irrigating crops, likely wheat (Figure D-11, Google Earth 2026). Permit G 17083 * IR is authorized to be used for commercial uses, domestic use expanded for one household and irrigation of 5.0 acres for the Oregon Raceway Park (OWRD 2026) and does not appear to be in use for irrigated crop production (Figure D-11, Google Earth 2026).

There are no unique crops within the surrounding lands needing special conditions to grow. There are no known crops within the surrounding lands supported by water delivery; as a result, water delivery will not be significantly impacted.

Water for construction or operation of the Facility will be obtained from a local municipality and/or other suppliers identified by the Applicant with existing water rights and trucked to the site. The Applicant may also source some water from an on-site exempt well for the O&M building and limit use of well water to below the 5,000 gallons per day threshold. There is no expectation that water availability will be significantly impacted, since water will either be trucked in from off-site or water use will remain below the 5,000 gallon per day exemption threshold.

Operations water use will be minimal and general daily use (handwashing, drinking, toilets) will not exceed 5,000 gallons per day. The Applicant may either construct an exempt well, allowed under ORS 537.545, or obtain bulk water from the same sources as during construction. Given that the operational water needs of the Facility represent an insignificant fraction of the total municipal water use in the surrounding lands, existing water rights will not be negatively affected, and sufficient water will be available for the intended uses. Water may be required for module washing during operations. If water is needed for industrial uses, such as solar panel washing, it will come from the same sources as during construction, or from or from another approved source with valid water rights. The Oregon Water Resources Department allows exempt well(s) to be used for long-term operational use such as for solar panel washing as long as withdrawals maintain compliance with ORS 537.545(1)(f) by not exceeding 5,000 gallons per day for all wells combined without securing a withdrawal permit. Therefore, no adverse impacts to water use and supply are anticipated during construction or operations.

Weeds and Pests

The Draft VSMP includes a Weed Control Plan and is provided in Exhibit C, Attachment C-2 – Appendix F. This plan provides the steps the Applicant will take to prevent, minimize, and control the establishment and spread of noxious weed species during both construction and operation of the Facility. Measures to minimize the spread of noxious weeds were developed to address the noxious weeds identified by Sherman County. A noxious weed monitoring schedule is included in the VSMP. Noxious weed monitoring will occur prior to construction, during construction, and during operation of the Facility. The Applicant's objective is to prevent the introduction of new noxious weed populations and spread of existing noxious weed populations. The Applicant will consult with the appropriate weed control authorities in the County and obtain approval of the final VSMP. As a result, noxious weeds and pests will be prevented from impacting farming operations within the surrounding lands.

Damage to Crops or Livestock

No damage to crops or livestock within the surrounding lands is anticipated. The Facility will be constructed within the micrositing area in the Facility site boundary. Construction and operation of the Facility will not prevent livestock operations from continuing. Livestock will not be impeded from their feed or grazing lands or prevented from obtaining shelter or water by the construction

or operation of the Facility. Livestock will be able to continue using uncultivated lands or the dryland wheat fields after the crops are harvested, as forage allows. The Facility will not prevent crops from growing within the surrounding lands. Crops will continue to receive sunlight, water, and nutrients needed to grow and thrive during construction and operation of the Facility. Concerns regarding the spread of dust during construction are addressed below and traffic related concerns are addressed above.

The Applicant is committed to working with participating landowners per the terms of the underlying lease to locate wind and solar components to minimize adverse impacts to the landowner's ongoing agricultural operations. Due to the above factors, EFSC may conclude that development of the Facility will not result in damage to crops or livestock within the surrounding lands.

Litter and Trespass

Waste generated from construction of the Facility will be minimized through detailed estimation of materials needs and through efficient construction practices. Construction of the Facility will not require the use of specialized structures, systems, or equipment for waste management or disposal. Standard construction waste bins will be kept on site to keep construction debris until it is hauled off site. Separate containers for small quantities of hazardous materials, such as oily rags or contained soil from minor spills, will be provided according to the contractor's spill prevention, containment, and countermeasures plan. Most waste will be removed from the site and reused, recycled, or disposed of at the nearby Columbia Ridge Landfill if necessary. The public landfill nearest to the Facility is the Columbia Ridge Landfill. The Columbia Ridge Landfill has indicated that they have adequate capacity to serve the Facility and does not anticipate reaching full capacity for another 140 years (see Exhibit L, Attachment L-3).

The Facility will be designed to operate without replacement parts, but some repair or replacement of electrical, solar, wind, or battery equipment is expected over the life of the Facility. Damaged equipment will be removed and disposed of at Columbia Ridge Landfill, or other approved disposal facility. Waste from the O&M building and other solid waste generated on site will be collected and recycled as feasible. Non-recyclable waste will be collected and transported to a local landfill. Disposal of materials for routine maintenance and housekeeping, such as lubrication oils and cleaning supplies, will be managed according to the pertinent regulations.

The incorporated communities near the Facility will continue to provide solid waste management services to their respective incorporated areas. Solid waste disposal for the Facility will be provided through a private contract with local commercial haulers.

The Sherman County Sheriff's Office has indicated that they can provide services to the Facility without impacting their current customer service base and recommended on-site security be implemented since they do not provide that service (see Exhibit L, Attachment L-3). The Applicant will continue to coordinate with the Sherman County Sheriff's Office prior to construction (see Exhibit L). The Facility is not open to the public, nor do customers visit the site as part of daily

operations. As a result, EFSC may find that development of the Facility will not result in significant impacts to farm practices from litter or trespass.

Reduction in Crop Yields

There is no anticipated reduction in crop yields within the surrounding lands. The Facility will be constructed within the micrositing area, therefore not damaging crops or reducing crop yields on surrounding lands. Generation of airborne dust during construction of the Facility will be mitigated through application of water on access roads and other areas of ground disturbance. As discussed above, traffic during construction of the Facility will be managed through a Road Use Agreement. The Applicant is actively coordinating with the County Roadmaster and a draft Road Use Agreement that includes input from the County Roadmaster and demonstrates compliance with the appliable provisions of the SCZO and Sherman County Transportation System Plan is included as Attachment L-4 to Exhibit L. Traffic will be mitigated in a manner to allow farming activities to continue with minimal disruption to farm management schedules. Water availability is discussed above. The spread of noxious weeds will be prevented through methods set forth in the Draft VSMP and specifically the Weed Control Plan (Attachment C-2 in Exhibit C). As a result, the Council may conclude that development of the Facility will not result in a reduction of crop yields within the surrounding lands.

Flooding

Some portions of the surrounding lands are located within a FEMA 100-year floodplain (FEMA 2025b). The Applicant will monitor construction stormwater impacts in accordance with an NPDES 1200-C construction stormwater permit issued by the ODEQ, and an ESCP, which will be finalized prior to construction (see Exhibit C, Attachment C-1). The ESCP will describe BMPs for erosion and sediment control, spill prevention and response procedures, proper disposal procedures, regular maintenance for vehicles and equipment, and employee training on spill prevention. As discussed above, nominal amounts of water will be needed for domestic purposes (hand washing, drinking, toilets) during operation of the Facility. Solar panels may require periodic washing to minimize the effects of dust and dirt accumulation on energy production. No water used on the site will be discharged into wetlands, streams, and other waterways. Due to the dry conditions at the proposed Facility and the relatively low rates of water use and application, it is expected that any excess water used during construction and operation will be lost within or near the proposed Facility site boundary, primarily through evaporation and infiltration. As a result, EFSC may conclude that development of the Facility will not result in flooding within the surrounding lands.

Dust and Erosion

Dust impacts will be temporary and will occur primarily during construction. The creation of dust will be minimized during construction through the application of water and other dust control measures as discussed in Exhibit C, including the Draft ESCP and the Draft VSMP (Exhibit C, Attachments C-1 and C-2).

During construction, potential impacts related to erosion will be minimal and will be addressed through the implementation of erosion control measures required by the Facility's NPDES 1200-C

construction permit through the ESCP developed for the Facility. Construction activities can introduce the potential for increased erosion due to soil disturbance, loss of vegetation (exposure of soil), compaction, and changes to surface drainage patterns. BMPs described in the NPDES permit application will minimize the potential for wind or water erosion and sedimentation of soils disturbed by Facility construction.

Facility operations are not expected to cause significant fugitive dust. Operations will be confined to gravel-surfaced areas including the apron constructed around each turbine, the solar arrays, the BESS, access roads, substations, and O&M building. No additional ground disturbance is anticipated to occur during Facility operations. All Facility components will be routinely inspected and any erosion and sediment control measures that are implemented will be maintained and repaired as needed. These measures may include but are not limited to straw wattles, mulching, and other soil stabilization controls, which shall be maintained, repaired, and replaced as needed to maintain maximum effectiveness; see Draft VSMP (Attachment C-2) for more detail on these BMPs as well as other soil control measures.

As mentioned above, the Applicant will minimize erosion by monitoring construction stormwater impacts of the Facility in accordance with a NPDES 1200-C construction stormwater permit, and an associated ESCP (see Exhibit C; Attachment C-1). The ESCP describes BMPs for erosion and sediment control, spill prevention and response procedures, proper disposal procedures, regular maintenance for vehicles and equipment, and employee training on spill prevention. The Facility's Draft VSMP identifying effective erosion and sediment control measures is provided as Attachment C-2 (Exhibit C). These documents will be submitted to the ODEQ. Erosion and sediment control measures will meet local, county, state, and federal requirements. Once the Facility is operational, sources of erosion are expected to be minimal. Stormwater runoff will be contained within the Facility site boundary and infiltrate into the soils. Solar panel washing may occur and will use quantities of water that will evaporate or will infiltrate into the ground within the immediate vicinity of its use.

As a result, EFSC may conclude that development of the Facility will not result in significant sources of dust or erosion within the surrounding lands.

Fire Risk

The Facility will be equipped with fire protection equipment in accordance with the Oregon Fire Code. Wildfire risk will be managed through the construction and operational Wildfire Management Plans (drafts included as Attachments M-1 and M-2 of Exhibit M, respectively). Through compliance with fire safety standards, the Applicant will minimize the risk of wildland fire during construction and operation. The construction contractor will be trained in fire prevention awareness and have on-site fire extinguishers to respond to small fires. In the event of a large fire, emergency responders will be dispatched.

As discussed in Exhibit L, fire protection service in the surrounding lands will be provided by the South Sherman Rural Fire Protection District (RFPD) and Moro RFPD. Records of correspondence with the South Sherman RFPD, Moro RFPD, and Sherman County Emergency Services are included

in Exhibit L, Attachment L-3. These service providers have confirmed that the construction and operation of the Facility will not impede their abilities to provide emergency services; South Sherman RFPD also provided an additional letter of support for the Facility (see Exhibit L, Attachment L-3). The Applicant will work with the South Sherman RFPD and Moro RFPD and Sherman County Emergency Services to determine response times to the site and this information will be included in the final construction and operational WMPs.

Facility roads will be sufficiently sized for emergency vehicle access in accordance with current Oregon Fire Code requirements, including Section 503 and Appendix D - Fire Apparatus Access Roads. The fenced areas around the O&M building and BESS will be graveled, with no vegetation present. Prior to construction of the Facility, fencing and access would be evaluated to ensure emergency responders can easily access the site.

As discussed in the Background Information Exhibit, BESS-specific fire prevention and control measures will be implemented at the Facility. Some of these measures include leak-proof modules for the batteries, 24-hour monitoring, installation of fire sensors, alarms, and clean agent-based fire extinguishing systems in every battery container.

Through compliance with fire safety standards and the implementation of the Wildfire Mitigation Plans, the Applicant will minimize the risk of wildland fire to farm practices within the surrounding lands during construction and operation.

Summary of Potential Impacts to Individual Farm Practices

As described in Table D-10, farm practices within the surrounding lands include dryland crop and irrigated crop cultivation and production and livestock operations. None of the impacts discussed above rise to a threshold of significant due to either a lack of impact or mitigation measures implemented to prevent more than minimal impact. The potential impacts either do not impact the farm operations within the surrounding lands or are mitigated such that the impacts remain minimal.

Cumulative Impacts to Farm Operations [OAR 660-033-0130(5)(c)(C)]

As described above in the *Potential Impacts to Farm Practices During Facility Construction and Operation* section*,* none of the impacts have risen to a level significant enough to have an important influence or effect on farm operations, residences, or businesses. Collectively, prevention, mitigation and monitoring efforts discussed above and in Exhibits C, L, M, N, and O2 will alleviate potential impacts from traffic, water availability and delivery, weeds and pests, damage to crops or livestock, litter and trespassing, reduction in crop yields, flooding, dust and erosion, and fire risk. There are no unique farm practices within the surrounding lands requiring special site conditions that would be at risk due to the proposed Facility.

Limitations to Conditions [OAR 660-033-0130(5)(c)(F)]

OAR 660-033-0130(5)(c)(F) is directed to the governing body and does not require findings from the Applicant.

5.5.2.2 OAR 660-033-0130(37)

(37) For purposes of this rule a wind power generation facility includes, but is not limited to, the following system components: all wind turbine towers and concrete pads, permanent meteorological towers and wind measurement devices, electrical cable collection systems connecting wind turbine towers with the relevant power substation, new or expanded private roads (whether temporary or permanent) constructed to serve the wind power generation facility, office and operation and maintenance buildings, temporary lay-down areas and all other necessary appurtenances, including but not limited to on-site and off-site facilities for temporary workforce housing for workers constructing a wind power generation facility. Such facilities must be removed or converted to an allowed use under section (19) or other statute or rule when project construction is complete. Temporary workforce housing facilities not included in the initial approval may be considered through a minor amendment request filed after a decision to approve a power generation facility. A minor amendment request shall be subject to section (5) and shall have no effect on the original approval. A proposal for a wind power generation facility shall be subject to the following provisions:

The Facility meets the definition of a Wind Power Generation Facility under OAR 660-033-0130(37). Facility components and related and supporting facilities are described in Sections 2.3, 2.10 and 2.11 within the Background Information Exhibit. For the purposes of this application, the Applicant is not currently considering the construction of temporary workforce housing; however, the Applicant understands that the need may arise in the future. If the Applicant decides to construct temporary workforce housing, it will be done in accordance with OAR 660-033-0130(37) and applicable County requirements.

Due to the existence of high-value farmland soils within the micrositing area (see Figure D-8), the provisions of OAR 660-033-0130(37)(a) would be applicable to the portion of the Wind Facility impacting those soils. Additionally, as described below, the micrositing area is entirely composed of arable land. Therefore, the provisions of OAR 660-033-0130(37)(b) shall apply to the Wind Facility, while the provisions specific to non-arable land (Pursuant to OAR 660-033-0130(37)(c)) are not applicable.

> *(a) For high-value farmland soils described at ORS 195.300(10), the governing body or its designate must find that all of the following are satisfied:*

ORS 195.300(10) provides multiple definitions of what is considered as "high-value farmland," but only ORS 195.300(10)(a) identifies soil classifications as part of the definition due to its inclusion of ORS 215.710 in the standard (see statute excerpts below).

ORS 195.300(10)

> *(a) High-value farmland as described in ORS 215.710 that is land in an exclusive farm use zone or a mixed farm and forest zone, except that the dates specified in ORS 215.710 (2), (4) and (6) are December 6, 2007.*
>
> . . . [omitted ORS 195.300(10)(b) through (f) as not applicable to high-value farmland soils definition]

ORS 215.710

(1) For purposes of ORS 215.705, high-value farmland is land in a tract composed predominantly of soils that, at the time the siting of a dwelling is approved for the tract, are:

(a) Irrigated and classified prime, unique, Class I or Class II; or

(b) Not irrigated and classified prime, unique, Class I or Class II.

. . . [omitted ORS 215.705(10)(2) through (6) as not applicable to high-value farmland soils definition when located in Eastern Oregon]

In the absence of a specific definition of "high-value farmland soils" provided by ORS 195.300(10), the Applicant has inferred that "high-value farmland soils" are the soil classifications identified by ORS 215.710(1)(a) and (b), since these are the soils that may cause land in a tract to qualify as "high-value farmland".

In summary, the Applicant understands "high-value farmland soils described at ORS 195.300(10)" to mean irrigated or not irrigated and classified prime, unique, Class I or Class II under the NRCS soil classification system (NRCS 2026). There are a few irrigation water rights within the micrositing area as shown on Figure D-7; however, as discussed in Section 3.3.1.1, the Solar Facility will avoid impacts to this land. NRCS classification of soils, including high-value farmland soils, within the micrositing area are shown in Figure D-8. Due to the dispersed nature of the high-value farmland soils within the micrositing area, the Applicant assumes a portion of these may be impacted by the Wind Facility.

(A) Reasonable alternatives have been considered to show that siting the wind power generation facility or component thereof on high-value farmland soils is necessary for the facility or component to function properly or if a road system or turbine string must be placed on such soils to achieve a reasonably direct route considering the following factors:

(i) Technical and engineering feasibility;

(ii) Availability of existing rights of way; and

(iii) The long term environmental, economic, social and energy consequences of siting the facility or component on alternative sites, as determined under paragraph (B);

Response: The standard above requires that an applicant consider reasonable alternative locations considering technical and engineering feasibility and availability of existing rights-of-way for the wind power generation facility or component thereof, to show that it is necessary to impact high-value farmland soils. EFSC has previously found that an alternative location or logical configuration of a proposed wind power generation facility on land that does not contain high-value farmland is a "reasonable" alternative under OAR 660-033-0130(37)(a)(A) only if the alternative location has a substantially similar wind resource compared to the configuration that would affect high-value

farmland.[13] In order for a high wind resource to be viable, there must be topographic features suitable for wind turbines and areas that are technically feasible for construction, including the installation of linear facilities.

Indications of high wind resources within Sherman County are evidenced by the locations of existing or proposed wind facilities, such as Golden Hills Wind Project, Klondike III Wind Project, and Biglow Farm Wind Project, which are all located in the northern portion of the county. As shown on Figure D-12, using an assumption that the Wind Facility would only be sited on non-irrigated soils, the northern portion of Sherman County contains a dispersed pattern of high-value farmland soils (primarily non-irrigated Class II). In this manner, locating the Wind Facility in another location with known high wind resources is not reasonable, because it would also impact high-value farmland soils. There are no other existing or proposed wind facilities in the southern half of Sherman County to rely on as evidence of high wind resources.

The Wind Facility will also make use of the existing and available right-of-way of US-97 for the transportation of materials and personnel. While US-97 runs north-south through Sherman County, as mentioned above, other locations within northern Sherman County would not feasibly avoid high-value farmland soils and there is no evidence of high wind resources further south in Sherman County.

Findings showing compliance with OAR 660-033-0130(37)(a)(B) are provided below.

> *(B) The long-term environmental, economic, social and energy consequences resulting from the wind power generation facility or any components thereof at the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located on other agricultural lands that do not include high-value farmland soils;*

Response: Long-term environmental, economic, social and energy consequences resulting from the Wind Facility on high-value farmland soils are not significantly more adverse than would typically result from the Wind Facility siting on other non-high-value farmland agricultural lands. In fact, the long-term consequences of doing so are positive. These positive benefits come from the incremental increase in renewable energy production, reduced reliance on carbon-based sources of energy thereby reducing greenhouse gas emissions, and helping Oregon meet its renewable energy goals. The Wind Facility provides participating landowners with diversified income streams to support their farm operations. The construction and operation of the Facility as a whole will generate both temporary and permanent jobs, bringing economic benefits and development to Sherman County (see Attachment D-2). Additionally, the Facility will have positive economic and social benefits by bringing additional revenue to local farmers and to the community in the form of property taxes, employment, and improved roads. The Wind Facility will have a permanent impact area of approximately 195 acres. Using the most conservative estimate where all of these acres consist of high-value farmland soils, the Wind Facility would impact approximately 4.7 percent of

[13] Montague Wind Power Facility Final Order September 10, 2010, pp 53-54, https://www.oregon.gov/energy/facilities/Facilities%20library/MWP-final-order-091010.pdf.

total high-value farmland soils within the site boundary[14].Using the current preliminary site layout, the Wind Facility would only impact 1.6 percent of total high-value farmland soils within the site boundary. In either scenario, the relatively small footprint of the Wind Facility will have negligible economic impact in the long term.

> *(C) Costs associated with any of the factors listed in paragraph (A) may be considered, but costs alone may not be the only consideration in determining that siting any component of a wind power generation facility on high-value farmland soils is necessary;*

Response: See response to subsection (A) above. Regardless of cost, feasible alternatives affecting materially less high-value farmland are not available in the general area. Costs are not a determinative factor in siting the Facility components in the proposed location as opposed to any other location. Fundamentally, it is the wind resource value, access to transmission, and relatively low natural resource constraints that are the determinative factors.

> *(D) The owner of a wind power generation facility approved under subsection (a) shall be responsible for restoring, as nearly as possible, to its former condition any agricultural land and associated improvements that are damaged or otherwise disturbed by the siting, maintenance, repair or reconstruction of the facility. Nothing in this subsection shall prevent the owner of the facility from requiring a bond or other security from a contractor or otherwise imposing on a contractor the responsibility for restoration; and*

Response: The Applicant acknowledges responsibility for restoring, as nearly as possible, to its former condition any agricultural land and associated improvements that are damaged or otherwise disturbed by the siting, maintenance, repair or reconstruction of the Facility. Exhibit F describes Facility retirement methodology and the financial assurance details for supporting Facility retirement. The Applicant also acknowledges the option for the Facility owner to require a bond or other financial security from a contractor or otherwise imposing on a contractor the responsibility for restoration as needed.

> *(E) The criteria of subsection (b) are satisfied.*

Response: Findings showing evidence of compliance with the criteria of subsection (b) are provided below.

> *(b) For arable lands, meaning lands that are cultivated or suitable for cultivation, including high-value farmland soils described at ORS 195.300(10), the governing body or its designate must find that:*

Response: As described in Section 3.3.3.2, all of the land within the Facility site boundary meets the definition of arable lands. As a result, the criteria of OAR 660-033-0130(37)(b)(A)-(D) are addressed below.

[14] There are approximately 4,113 acres of high-value farmland within the site boundary.

> *(A) The proposed wind power facility will not create unnecessary negative impacts on agricultural operations conducted on the subject property. Negative impacts could include, but are not limited to, the unnecessary construction of roads, dividing a field or multiple fields in such a way that creates small or isolated pieces of property that are more difficult to farm, and placing wind farm components such as meteorological towers on lands in a manner that could disrupt common and accepted farming practices;*

Response: The Applicant has designed the Wind Facility layout in consideration of landowner farm management needs and per the negotiated lease agreements. Many Facility landowners have a desire to maintain farming practices on their properties (Table D-6). The landowners worked with the Applicant to exclude the more productive/more suitable portions of agricultural and grazing lands in their holdings from the Facility leases, forgoing revenue from Facility operations in the interest of preserving agriculture within the community. Revenue generated from the Facility will be used to subsidize the remaining farming operations on the more productive lands.

The areas being leased to the Facility are described by many landowners as highly erodible and limited in production due to soil depth and precipitation and lack of irrigation. Where available, the Applicant will use existing roads and minimize the number and length of new access roads to the extent practicable (see Figure 3.1, Background Information Exhibit for a preliminary Facility layout). No fencing is required around the turbines or access roads, which would prevent landowners from accessing farm fields on either side of the Wind Facility access roads or turbines. On properties with existing cattle ranching operations, the Applicant will install gates or cattle guards where new access roads cross landowner fences to protect and contain cattle.

During Facility operation, wind turbines and associated roads are compatible with continued farming activities due to their small footprint. Additionally, landowners may make use of the new roads to access their fields. During construction and operation of the Facility, the Applicant will further consult with landowners to determine additional measures to reduce or avoid adverse impacts to existing agricultural operations. For these reasons, EFSC may find that the Wind Facility will not create unnecessary negative impacts to the agricultural operations occurring within the site boundary and complies with OAR 660-033-0130(37)(b)(A).

> *(B) The presence of a proposed wind power facility will not result in unnecessary soil erosion or loss that could limit agricultural productivity on the subject property. This provision may be satisfied by the submittal and county approval of a soil and erosion control plan prepared by an adequately qualified individual, showing how unnecessary soil erosion will be avoided or remedied and how topsoil will be stripped, stockpiled and clearly marked. The approved plan shall be attached to the decision as a condition of approval;*

Response: Exhibit C addresses soil protection, including a Draft ESCP (Attachment C-1 of Exhibit C). This plan provides the methodology for how unnecessary soil erosion will be avoided or remedied and how topsoil will be stripped, stockpiled and clearly marked. As a result, the Facility complies with OAR 660-033-0130(37)(b)(B).

(C) Construction or maintenance activities will not result in unnecessary soil compaction that reduces the productivity of soil for crop production. This provision may be satisfied by the submittal and county approval of a plan prepared by an adequately qualified individual, showing how unnecessary soil compaction will be avoided or remedied in a timely manner through deep soil decompaction or other appropriate practices. The approved plan shall be attached to the decision as a condition of approval; and

Response: Exhibit C addresses soil protection, including a Draft ESCP and a Draft VSMP (Attachments C-1 and C-2 of Exhibit C, respectively). Together these plans provide the methodology for prevention of soil compaction where feasible and mitigation and repair of unnecessary soil compaction. As a result, the Facility complies with OAR 660-033-0130(37)(b)(C).

(D) Construction or maintenance activities will not result in the unabated introduction or spread of noxious weeds and other undesirable weeds species. This provision may be satisfied by the submittal and county approval of a weed control plan prepared by an adequately qualified individual that includes a long-term maintenance agreement. The approved plan shall be attached to the decision as a condition of approval.

Response: A Draft VSMP is included as Attachment C-2 of Exhibit C and addresses the prevention, monitoring, and control of all Sherman County-identified noxious weeds introduced as a result from construction or operation of the Wind Facility. As a result, the Facility complies with OAR 660-033-0130(37)(b)(D).

(c) For nonarable lands, meaning lands that are not suitable for cultivation, the governing body or its designate must find that the requirements of paragraph (b)(D) are satisfied.

Response: Nonarable lands are not located within the Facility site boundary. As a result, this criterion is not applicable.

(d) In the event that a wind power generation facility is proposed on a combination of arable and nonarable lands as described in subsections (b) and (c) the approval criteria of subsection (b) shall apply to the entire project.

Response: Nonarable lands are not located within the Facility site boundary. As a result, this criterion is not applicable.

5.5.2.3 OAR 660-033-0130(38)

(38) A proposal to site a photovoltaic solar power generation facility except for a photovoltaic solar power generation facility in eastern Oregon subject to the provisions of paragraphs (44)(a)(B) and (C) shall be subject to the following definitions and provisions:

(a) "Arable land" means land in a tract that is predominantly cultivated or, if not currently cultivated, predominantly comprised of arable soils.

(b) "Arable soils" means soils that are suitable for cultivation as determined by the governing body or its designate based on substantial evidence in the record of a local land use

application, but "arable soils" does not include high-value farmland soils described at ORS 195.300(10) unless otherwise stated.

(c) "Dual-use development" means developing the same area of land for both a photovoltaic solar power generation facility and for farm use.

(d) "Nonarable land" means land in a tract that is predominantly not cultivated and predominantly comprised of nonarable soils.

(e) "Nonarable soils" means soils that are not suitable for cultivation. Soils with an NRCS agricultural capability class V–VIII and no history of irrigation shall be considered nonarable in all cases. The governing body or its designate may determine other soils, including soils with a past history of irrigation, to be nonarable based on substantial evidence in the record of a local land use application.

Response: The above definitions have been used to determine the land categories for the Solar Facility. As discussed in Section 3.3.2.2 and Table D-4 above, all tracts within the Goal 3 Exception Area comprise arable land. No dual-use development is proposed as part of the Solar Facility. While some nonarable soils exist within the Goal 3 Exception Area, there is no "nonarable land."

(f) "Photovoltaic solar power generation facility" includes, but is not limited to, an assembly of equipment that converts sunlight into electricity and then stores, transfers, or both, that electricity. This includes photovoltaic modules, mounting and solar tracking equipment, foundations, inverters, wiring, storage devices and other components. Photovoltaic solar power generation facilities also include electrical cable collection systems connecting the photovoltaic solar generation facility to a transmission line, all necessary grid integration equipment, new or expanded private roads constructed to serve the photovoltaic solar power generation facility, office, operation and maintenance buildings, staging areas and all other necessary appurtenances. For purposes of applying the acreage standards of this section, a photovoltaic solar power generation facility includes all existing and proposed facilities on a single tract, as well as any existing and proposed facilities determined to be under common ownership on lands with fewer than 1320 feet of separation from the tract on which the new facility is proposed to be sited. Projects connected to the same parent company or individuals shall be considered to be in common ownership, regardless of the operating business structure. A photovoltaic solar power generation facility does not include a net metering project established consistent with ORS 757.300 and OAR chapter 860, division 39 or a Feed-in-Tariff project established consistent with ORS 757.365 and OAR chapter 860, division 84.

Response: The proposed Solar Facility meets the definition of "photovoltaic solar power generation facility" and includes solar arrays, inverters, a BESS facility and subcomponents (i.e., inverters), a collector substation, an O&M enclosure, site access roads, internal roads, perimeter fencing, facility entry gates, medium-voltage (34.5-kV) collector lines, and temporary laydown areas. The BESS facility will be situated near the O&M enclosure and within the Solar Facility fence line. In addition, the 34.5-kV collector lines are also part of the Solar Facility as they will collect the energy from the solar modules and transfer it to the collector substation.

The proposed 500-kV gen-tie line and 230-kV collector lines supporting the Facility as a whole are not included in the definition of "photovoltaic solar power generation facility." Instead, as directed by EFSC and as discussed in Section 5.2.1.1, proposed transmission lines are treated as a *utility facility necessary for public service* pursuant to ORS 215.283(1)(c) if the standards of ORS 215.274 and ORS 215.275 are met. Compliance with ORS 215.274 for the gen-tie transmission line is discussed in Section 5.5.1.1, while compliance with ORS 215.275 for the collector lines is discussed in Section 5.5.1.2 above.

> *(g) For high-value farmland described at ORS 195.300(10), a photovoltaic solar power generation facility shall not use, occupy, or cover more than 12 acres unless:*
>
> > *(A) The provisions of paragraph (h)(H) are satisfied; or*
> >
> > *(B) A county adopts, and an applicant satisfies, land use provisions authorizing projects subject to a dual-use development plan. Land use provisions adopted by a county pursuant to this paragraph may not allow a project in excess of 20 acres. Land use provisions adopted by the county must require sufficient assurances that the farm use element of the dual-use development plan is established and maintained so long as the photovoltaic solar power generation facility is operational or components of the facility remain on site. The provisions of this subsection are repealed on January 1, 2022.*

Response: As described in Section 3.3.2.1 above, there is no high-value farmland that will be used, occupied, or covered by the Solar Facility. As a result, the criteria of OAR 660-033-0130(38)(h) are not applicable and have been omitted from this narrative.

> *(i) For arable lands, a photovoltaic solar power generation facility shall not use, occupy, or cover more than 20 acres. The governing body or its designate must find that the following criteria are satisfied in order to approve a photovoltaic solar power generation facility on arable land:*

Response: As discussed in Section 3.3.2.2, the Solar Facility will cover more than 20 acres of arable land.

> > *(A) Except for electrical cable collection systems connecting the photovoltaic solar generation facility to a transmission line, the project is not located on those high-value farmland soils listed in OAR 660-033-0020(8)(a);*

Response: As discussed in Section 3.4 and due to the flexibility in final siting design requested by the Applicant, the Solar Facility may be sited on the high-value farmland soils listed in OAR 660-033-0020(8)(a). As allowed by OAR 660-033-0130(38)(k), that Applicant is requesting an exception to Goal 3 pursuant to ORS 197.732 and OAR chapter 660, division 4 as discussed in Section 5.7 below.

> > *(B) The project is not located on those high-value farmland soils listed in OAR 660-033-0020(8)(b)-(e) or arable soils unless it can be demonstrated that:*
> >
> > > *(i) Nonarable soils are not available on the subject tract;*

(ii) Siting the project on nonarable soils present on the subject tract would significantly reduce the project's ability to operate successfully; or

(iii) The proposed site is better suited to allow continuation of an existing commercial farm or ranching operation on the subject tract than other possible sites also located on the subject tract, including those comprised of nonarable soils;

Response: As shown on Figure D-8, within the micrositing area there are few nonarable soils (Class V-VIII) where the Solar Facility could be sited. Of the 22,278 acres within the micrositing area, only 643 acres (or 3 percent) consist of non-arable soils. The Applicant estimates it will need several thousand acres to support the establishment of a 1400-megawatt (MW) Solar Facility. As a result, siting the Solar Facility on nonarable soils present on the subject tract would significantly reduce the Facility's ability to operate successfully. This standard is met.

(C) No more than 12 acres of the project will be sited on high-value farmland soils described at ORS 195.300(10);

Response: As discussed in Section 3.4 and due to the flexibility in final siting design requested by the Applicant, the Solar Facility may be sited on more than 12 acres of high-value farmland soils. As allowed by OAR 660-033-0130(38)(k), that Applicant is requesting an exception to Goal 3 pursuant to ORS 197.732 and OAR chapter 660, division 4 as discussed in Section 5.7 below.

(D) A study area consisting of lands zoned for exclusive farm use located within one mile measured from the center of the proposed project shall be established and:

(i) If fewer than 80 acres of photovoltaic solar power generation facilities have been constructed or received land use approvals and obtained building permits within the study area, no further action is necessary.

(ii) When at least 80 acres of photovoltaic solar power generation facilities have been constructed or received land use approvals and obtained building permits, either as a single project or as multiple facilities within the study area, the local government or its designate must find that the photovoltaic solar power generation facility will not materially alter the stability of the overall land use pattern of the area. The stability of the land use pattern will be materially altered if the overall effect of existing and potential photovoltaic solar power generation facilities will make it more difficult for the existing farms and ranches in the area to continue operation due to diminished opportunities to expand, purchase or lease farmland, acquire water rights, or diminish the number of tracts or acreage in farm use in a manner that will destabilize the overall character of the study area; and

Response: As shown on Figure D-5, the center of the Solar Facility is approximately where Tracts 9 and 10 are connected. Also shown on Figure D-5, there are no photovoltaic solar power generation facilities that have been constructed or received land use approvals and obtained building permits

within at least one mile of the approximate center of the Solar Facility. Therefore, no further action is necessary under this standard.

(E) The requirements of paragraphs (h)(A), (B), (C) and (D) are satisfied.

Response: These requirements are included herein and addressed below.

(h) The following criteria must be satisfied in order to approve a photovoltaic solar power generation facility on high-value farmland described at ORS 195.300(10).

(A) The proposed photovoltaic solar power generation facility will not create unnecessary negative impacts on agricultural operations conducted on any portion of the subject property not occupied by project components. Negative impacts could include, but are not limited to, the unnecessary construction of roads dividing a field or multiple fields in such a way that creates small or isolated pieces of property that are more difficult to farm, and placing photovoltaic solar power generation facility project components on lands in a manner that could disrupt common and accepted farming practices;

Response: Many Facility landowners have a desire to maintain farming practices on their properties (Table D-6). These landowners worked with the Applicant to exclude the more productive/more suitable portions of agricultural and grazing lands in their holdings from the Facility leases, forgoing revenue from Facility operations in the interest of preserving agriculture within the community. Revenue generated from the Facility will be used to subsidize the remaining farming operations on the more productive lands. The Solar Facility has been configured to allow these farming operations to continue, if desired by the landowner.

The Facility layout has sited new access roads supporting the solar components to be primarily located within the fenced arrays. Where access roads are required to extend from the fenceline to the closest existing access point (i.e. existing county right-of-way or farm road), the road extents were sited to minimize impacts to the surrounding farmland to the extent practicable. The Solar Facility roads avoid impacting all existing irrigation place-of-use water rights within the site boundary. If adjustments to the preliminary Solar Facility layout are needed to minimize negative impacts to agricultural operations on the surrounding lands, the Applicant will continue to coordinate with the underlying landowners to resolve these issues.

(B) The presence of a photovoltaic solar power generation facility will not result in unnecessary soil erosion or loss that could limit agricultural productivity on the subject property. This provision may be satisfied by the submittal and county approval of a soil and erosion control plan prepared by an adequately qualified individual, showing how unnecessary soil erosion will be avoided or remedied. The approved plan shall be attached to the decision as a condition of approval;

Response: A Draft ESCP prepared by a qualified individual is included as Attachment C-1 in Exhibit C. This ESCP will be submitted to the County for review and approval as required by EFSC.

(C) Construction or maintenance activities will not result in unnecessary soil compaction that reduces the productivity of soil for crop production. This provision may be satisfied by the submittal and county approval of a plan prepared by an adequately qualified individual, showing how unnecessary soil compaction will be avoided or remedied in a timely manner through deep soil decompaction or other appropriate practices. The approved plan shall be attached to the decision as a condition of approval;

Response: The findings within Exhibit C discuss potential soil impacts, mitigation measures, and monitoring for protecting the soil during Facility construction, operation and decommission. Exhibit C also includes a Draft ESCP (Attachment C-1 in Exhibit C) and a Draft VSMP (Attachment C-2; includes Fugitive Dust Control Plan [Appendix C] and Weed Control Plan [Appendix F]). The draft VSMP prepared by an adequately qualified individual will be submitted to the County for review and approval as required by EFSC showing how unnecessary soil compaction will be avoided or remedied in a timely manner through deep soil decompaction or other appropriate practices.

(D) Construction or maintenance activities will not result in the unabated introduction or spread of noxious weeds and other undesirable weed species. This provision may be satisfied by the submittal and county approval of a weed control plan prepared by an adequately qualified individual that includes a long-term maintenance agreement. The approved plan shall be attached to the decision as a condition of approval;

Response: A Draft Weed Control Plan prepared by an adequately qualified individual is included as Appendix F in Exhibit C, Attachment C-2. This plan and a long-term maintenance agreement will be submitted to the county for review and approval as required by EFSC.

(j) For nonarable lands, a photovoltaic solar power generation facility shall not use, occupy, or cover more than 320 acres. The governing body or its designate must find that the following criteria are satisfied in order to approve a photovoltaic solar power generation facility on nonarable land:

Response: As described in Section 3.3.2 above, no nonarable land will be used, occupied, or covered by the Solar Facility. As a result, the criteria of OAR 660-033-0130(37)(j)(A) through (G) are not applicable and have been omitted from this narrative.

(k) An exception to the acreage and soil thresholds in subsections (g), (h), (i), and (j) of this section may be taken pursuant to ORS 197.732 and OAR chapter 660, division 4.

Response: As discussed in Section 3.3.2, the Solar Facility will cover more than 20 acres of arable land. As a result, an exception to Goal 3 pursuant to ORS 197.732 and OAR chapter 660, division 4 is required and discussed in Section 5.7 below.

(l) The county governing body or its designate shall require as a condition of approval for a photovoltaic solar power generation facility, that the project owner sign and record in the deed records for the county a document binding the project owner and the project owner's successors in interest, prohibiting them from pursuing a claim for relief or cause of action alleging injury from farming or forest practices as defined in ORS 30.930(2) and (4).

Response: The Applicant acknowledges this condition of approval.

(m) Nothing in this section shall prevent a county from requiring a bond or other security from a developer or otherwise imposing on a developer the responsibility for retiring the photovoltaic solar power generation facility.

Response: A bond or other security is required by EFSC and the security is issued in the name of the State. The Applicant is providing financial assurance for site restoration after Facility retirement as provided in Exhibit F.

5.6 Noncompliance with Applicable Substantive Criteria – OAR 345-022-0030(7)(b)(C)(iv)

> *(iv) If the proposed facility might not comply with all applicable substantive criteria, identify the applicable statewide planning goals and describe how the proposed facility complies with those goals; and*

Response: As demonstrated by the findings above, the Facility complies with all applicable substantive criteria except to the extent that OAR 660-033-0130(38)(i), (i)(A) and (i)(C) require a goal exception as to the Solar Facility, which may use, occupy, or cover more than 20 acres of arable land, may be located on high-value farmland soils listed in OAR 660-033-0020(8)(a) and high-value farmland soils described at ORS 195.300(10). However, in accordance with OAR 345-022-0030(2)(b)(B), EFSC may find compliance with the Land Use standard if it finds the Facility would otherwise comply with the applicable statewide planning goals, or that an exception to Statewide Land Use Planning Goal 3 is justified. See Section 5.7 for evidence regarding why an exception to any applicable statewide planning goal is justified.

5.7 Statewide Planning Goal Exceptions – OAR 345-022-0030(7)(b)(C)(v)

> *(v) If the proposed facility might not comply with all applicable substantive criteria or applicable statewide planning goals, describe why an exception to any applicable statewide planning goal is justified, providing evidence to support all findings by the Council required under ORS 469.504(2).*

Response: As discussed in Sections 3.3.4 and 5.5.2.3 of this exhibit, the Solar Facility will occupy more than 20 acres of arable land, and therefore does not meet the acreage standards under OAR 660-033-0130(38)(i) and requires an exception to Statewide Land Use Planning Goal 3 (i.e., Goal 3). The Applicant provides reasons under the Goal 3 exception to justify not meeting these standards.

The Council may take an exception to Goal 3 for an energy facility under the Council's jurisdiction if the controlling criteria listed under ORS 469.504(2)(c) and OAR 345-022-0030(4)(c) are met. The Applicant demonstrates below that a "reasons" exception is warranted under ORS 469.504(2)(c) and OAR 345-022-0030(4)(c).

ORS 469.504(2) provides that an exception may be taken on any of three grounds:

- That the land is "physically developed to the extent that the land is no longer available for uses allowed by the applicable goal;"

- That the land "is irrevocably committed … to uses not allowed by the applicable goal;" or
- That certain standards are met because the facility is compatible with existing adjacent uses and other relevant factors are met; or what is referred to as a "reasons" exception.

The Solar Facility meets the standards for a "reasons" exception to Goal 3 under ORS 469.504(2)(c) and OAR 345-022-0030(4)(c) because:

1. Reasons justify why the state policy embodied in Goal 3 should not apply (see Section 5.7.1).
2. The Solar Facility will avoid, minimize, and mitigate potential significant environmental, economic, social, and energy consequences (see Section 5.7.2).
3. The Solar Facility will be made compatible with other adjacent uses through the implementation of BMPs and mitigation measures (see Section 5.7.3).

The Applicant demonstrates that locating the Solar Facility anywhere within the micrositing area, subject to the proposed conditions, will be compatible with adjacent farm uses. The Goal 3 Exception Area consists of 8,500 acres within the 22,278-acre micrositing area. The Applicant is requesting maximum flexibility of site design within the micrositing area. As a result, while the actual footprint of the Solar Facility will likely be less than the Goal 3 Exception Area, the Goal 3 exception analysis assumes the entire permanent disturbance area related to the solar components and shared components will be developed and may remove up to 8,500 acres of arable land from Goal 3 protection.[15]

5.7.1 Demonstration that a "Reasons" Exception is Appropriate

ORS 469.504(2)(c)(A); OAR 345-022-0030(4)(c)(A) Reasons justify why the state policy embodied in the applicable goal should not apply;

In accordance with OAR 660-015-0000(3), the policy of Goal 3 is:

To preserve and maintain agricultural lands.

ORS 469.504(2)(c)(A) and OAR 345-022-0030(4)(c)(A) provide that the Council may find a facility justifies an exception to Statewide Planning Goal 3 if "reasons" justify why the policy embedded in Goal 3 (i.e. to preserve and maintain agricultural lands) should not apply to the facility. EFSC has broad authority and discretion in determining what "reasons" justify the exception. The Oregon legislature adopted a goal exception test for EFSC that is intentionally less stringent than the goal exception test in ORS Chapter 197, omitting Ch. 197's alternative analysis test in EFSC proceedings. *See Save Our Rural Oregon v. Energy Facility Siting Council*, 339 Or 353, 372 (2005).

EFSC has discretion to approve a Goal 3 exception based on "reasons" it determines warrant the exception. As evidenced by previous Goal 3 exception approvals, EFSC may rely on reasons specific to Goal 3 policies (i.e., minimal impacts to agriculture, economic benefits to the local agricultural community) or reasons that are not associated with Goal 3 policies (i.e., locational dependency,

[15] The Applicant anticipates impacting less than 8,500 acres of arable land in the final design, and the final acreage subject to the Goal 3 exception will be provided with the Solar Facility's as-built drawings.

limited impacts to other environmental resources, general rural economic benefits, etc.). EFSC has the discretion and authority to balance the policies that are embedded in the goal for which an exception is sought with its policy directive in ORS 469.010, other statewide planning goal policies and objectives, and other policy reasons that EFSC determines warrant the requested exception.

In the following discussion, the Certificate Holder provides the following reasons to justify why Goal 3 should not apply to the agricultural lands that will be impacted by the Solar Facility:

1. The Solar Facility is locationally dependent because of its proximity to an existing transmission line with interconnection capacity to connect the Solar Facility to the regional grid for interconnection, thus avoiding the need to construct lengthy high-voltage transmission lines.
2. The Solar Facility will provide economic development benefits to the local agricultural economy.
3. The site provides substantial solar energy generation capacity with no impacts to high-value farmland or irrigation water rights.

5.7.1.1 Locational Dependency

Locational dependency refers to the proximity of the Solar Facility to existing infrastructure needed to construct and operate the facility, or the presence of uncommon geographical attributes at a site that would create a significant comparative advantage for the facility. The entire Facility, including the Solar Facility, is locationally dependent on the existing BPA 500-kV Ashe-Marion Transmission Line which has been independently operated by BPA for over 10 years. The BPA 500-kV Ashe-Marion Transmission Line has the necessary capacity to transmit the energy output from the Solar Facility to the regional grid. Additionally, this 500-kV transmission line is an important component of the electrical grid and travels between Salem, Oregon, and eastern Washington.

The Applicant's interconnection agreement is with BPA, which requires that power generated by the Facility be delivered to the BPA 500-kV Ashe-Marion Transmission Line via the BPA switchyard. The Solar Facility's locational dependence to this line also stems from its unique interconnection queue position request, in that the Facility is effectively first-in-line to interconnect to regional transmission here. This particular BPA switchyard is also a key component of regional transmission planning. The Applicant understands that BPA has determined that this switchyard is the optimum point to access the existing 500-kV Ashe-Marion Transmission Line and support efficient operation of the regional transmission network. The Applicant understands the switchyard is being designed not only to serve the Facility's interconnection, but also to fit within BPA's broader transmission planning objectives and accommodate future use of the transmission corridor. As a result, the switchyard and Solar Facility are both dependent on, and integral to, this specific high-voltage transmission location.

The Solar Facility is also locationally dependent on existing transportation corridors. The micrositing area is sited on either side of US-97 and will rely on it and the connecting transportation network for the transportation of materials, water, and personnel. There is also an

extensive network of existing county roads traveling both adjacent to and through the micrositing area. As discussed in Exhibit L, the primary route will be via Interstate Highway 84 (I-84) to US-97 at Biggs Junction. This route is assumed to constitute the primary transportation route because most of the construction-related traffic will be from workforce commute trips, and the communities that are most likely to provide temporary housing are located along or near this route. The alternate transportation routes will be via I-84 to US-197 at The Dalles, continuing south on to OR-216 to Tygh Valley then travelling east to the Facility boundary. Some workforce traffic may also come from south of the Facility near Madras, taking either US-97 to travel north to the site boundary, or taking US-197 north to OR-216 to travel east to the site boundary. This would most likely be limited to commuting workers that live in communities along those routes. The location of the Solar Facility therefore eliminates the need to construct major new access routes to connect with the regional transportation network, as well as minimizes the need for new access roads within the micrositing area. As a result of this proximity to existing public roadways and the larger transportation network, access to the Solar Facility is available without the need for construction of new, or substantial modification, of existing public roads.

Based on the above factors, the Solar Facility is locationally dependent on proximity to the BPA 500-kV Ashe-Marion Transmission Line and related interconnection switchyard hub, and US-97 transportation infrastructure.

5.7.1.2 Benefits to the Local Agricultural Economy

As noted in the ODOE memorandum dated November 27, 2024, local economic benefits associated with a proposed solar facility may include lease payments to underlying landowners, direct economic tax benefits to the local government in which the solar facility is proposed to be located, as well as direct and indirect economic benefits to the local economy (ODOE 2024). In Sherman County, the local economy is primarily a rural, agricultural-based economy. As described in the Agricultural Impact Analysis (Attachment D-1), agriculture is the dominant land use and a defining component of the economy in Sherman County, consistent with much of Eastern Oregon. In 2022, farmland accounted for approximately 76 percent of land use within Sherman County, compared to 25 percent statewide. Although Sherman County represents less than 3 percent of Oregon's total farmland acreage, agriculture plays a disproportionately important role in the County's land use and economic structure. In 2022, Sherman County generated approximately $60.3 million in agricultural sales, representing roughly one percent of Oregon's total agricultural revenue of $6.8 billion (see Attachment D-1). Therefore, broad economic benefits to Sherman County through tax payments and economic impacts from construction and operational spending would have benefits to the local agricultural economy, which has an outsized impact on the local economy as a whole.

The Applicant estimates that the entire Facility, including the Solar Facility, has the potential to generate substantial new tax revenues for Sherman County and other local taxing districts. On an annual basis, Facility-related property tax revenues are estimated to increase Sherman County property tax collections by approximately 30 to 48 percent relative to fiscal year 2024–25 collections. Over the Facility's anticipated 30-year operational life, the Facility is expected to

generate significant property tax revenues for the county, with final values dependent on participation in various configurations of a Strategic Investment Program (SIP) and Fee in Lieu of Property Taxes (PILOT) programs.

In addition to property taxes, Facility construction is anticipated to generate transient lodging tax (TLT) revenues associated with the temporary non-local construction workforce. Depending on worker lodging preferences and occupancy patterns, TLT revenues are estimated to range from approximately $0.5 million to $5.1 million during the approximately 30-month construction period, further supporting local governments. These revenues would be distributed among the State of Oregon and local taxing jurisdictions (see Attachment D-2).

As noted in Section 3.4.3, the Facility will also produce significant economic output in the local economy from Facility-related construction and operational spending. The Applicant commissioned an analysis (Attachment D-2) to evaluate how Facility-related spending would support employment, labor income, and economic output within the local area economy. The analysis found that construction-related spending by the Facility within the local area economy is estimated to support substantial secondary economic activity. Over the construction period, local expenditures are estimated to support:

- Approximately 1,899 total annual jobs, including direct, indirect, and induced employment.
- Approximately $369.41 million in labor income over the full construction period.
- Approximately $3.43 billion in total economic output, of which roughly $1.46 billion is expected to occur within the local area economy.

The estimated output multiplier for construction is 1.15, indicating that for every dollar of direct construction spending, an additional $0.15 in economic output is supported within the local area economy.

During the 30-year operational period, Facility operations are expected to directly employ approximately 20 full-time workers residing within the local area, with aggregate wages and benefits estimated at approximately $2.2 million annually. Total annual operations-related expenditures are estimated at $36.9 million, including maintenance, administration, insurance, replacement parts, and other operating costs. Annual operations-related spending is estimated to support:

- Approximately 100 total jobs, including direct, indirect, and induced employment.
- Approximately $6.9 million in total labor income annually.
- Approximately $15.5 million in secondary economic output within the local area economy.

The estimated output multiplier for operations is 1.42, reflecting the ongoing circulation of operations-related spending within the local area economy. While operations-related impacts are smaller in magnitude than construction impacts, they represent stable, recurring economic contributions over the long term.

The local area economy currently supports approximately 35,608 jobs and generates approximately $9.2 billion in annual economic output. When viewed in this context, annual local

construction-related impacts represent approximately 3 to 6 percent of local area employment and output during the construction period, reflecting the large scale of the Facility and the concentration of spending over a relatively short timeframe. Operations-related impacts represent a smaller share of the local economy, approximately 0.3 percent of employment and 0.4 percent of output, but provide sustained economic contributions over the Facility's operating life. These ongoing impacts contribute to long-term economic stability through continued employment, business activity, and income generation.

Overall, the Facility is expected to generate substantial short-term economic activity during construction and provide sustained, long-term economic contributions during operations, supporting employment, labor income, and business activity within the broader local and regional economy.

However, even putting the local economic benefits of property tax payments, TLT payments, and indirect economic benefits from Facility spending aside, the Facility will also provide local economic benefits, particularly to the local agricultural economy through the Applicant's proposed Agricultural Investment Plan (Attachment D-3). As noted in Section 3.4, the Applicant assessed the potential economic impacts of removing up to 8,500 acres from agricultural use, of which, approximately 4,659 acres were assessed as being in winter wheat cultivation. The Agricultural Impact Analysis (Attachment D-1) modeled the economic impact of the anticipated wheat production loss from the Goal 3 Exception Area based on the current Solar Facility layout. The modeled indirect economic impacts are anticipated to be the best measurement of potential economic effects to the local economy from the removal of land from cultivation and represent a reduction in local spending on inputs for dryland wheat farming. Some of the economic activity currently supported by wheat production may be replaced or exceeded by ongoing Facility operations and maintenance expenditures, including weed management, road maintenance, and other operational services within the Goal 3 Exception Area. However, to be conservative, the Applicant did not factor in Facility operational spending in assessing the potential local economic impacts from the removal of dryland wheat production.

The Agricultural Impact Analysis used the Facility's preliminary layout to estimate an acreage of wheat removed from production to estimate the production value and model the economic impacts. The estimated acreage affected by the Facility each year used in the analysis was 4,659 acres. Using a price of $6.12 per bushel, estimated annual production value of winter wheat sales for the 4,659 acres of cultivated wheat land affected by the Solar Facility is estimated at $534,000. The Agricultural Impact Analysis used this estimated production value to model the indirect economic activity supported by the affected wheat production within Sherman County. The indirect economic impact represents the decrease in economic activity supported by the agricultural production of land within the affected wheat acres. Because the wheat operations purchase some of their inputs within Sherman County, it supports additional economic activity through spending on items such as fuel, fertilizer, seed, and equipment. Crop production within the affected acres supports 1.8 FTE indirect jobs associated with $116,000 in labor income. The estimated indirect economic output is $232,000 annually. Calculated over a period of 30 years of operation, and adjusting for inflation, the

estimated indirect output would be $4,547,302 or $976 per acre of farmland taken out of production.

In the Agricultural Investment Plan (Attachment D-3), the Applicant proposes to pay, prior to construction, $976 per acre for each acre the Solar Facility removes from wheat production and place this funding into the Speedway Agricultural Investment Fund account that will be managed by MCEDD in partnership with Sherman County. This Agricultural Investment Fund account will be used to fund mitigation projects under the Agricultural Investment Plan. The total number of acres removed from wheat production by the Speedway Solar Facility will be determined based on the final layout confirmed during the ODOE's pre-construction compliance review. The final investment fund payments will be based on the actual acres identified in the final design of the Solar Facility, which may be less or more than the 4,659 acres identified in the Agricultural Impact Analysis.

To help inform the development of the Agricultural Investment Plan, the Applicant conducted in-person and virtual meetings with a variety of agricultural stakeholders involved in the Sherman County agricultural community. Stakeholders included representatives of Sherman County BOC/County Court, Sherman County Farm Bureau, Sherman County Emergency Services, South Sherman Fire District, Sherman County Weed Department, Sherman County Planning Department, City of Grass Valley City Council, Oregon Wheat Growers' League and Wheat Commission, OSU Sherman County Extension Service, OSU College of Agricultural Sciences, NW Grain Growers, MCEDD, and Sherman County Soil and Water Conservation District. A meeting log and summary of key themes from these meetings is included in Attachment D-3.

Under the Agricultural Investment Plan, a selection committee of local stakeholders will screen potential agricultural projects and make recommendations to the Sherman County Court who will ultimately select what projects would be funded and/or what organizations would be awarded mitigation funds. The Agricultural Investment Plan identifies selection criteria unique to the Sherman County agricultural community and its specific needs that will be applied to proposed mitigation projects. The input from these agricultural stakeholders and the selection criteria ensure that selected projects will bring net economic benefit to the county's agricultural community, which is primarily composed of dryland wheat farmland and revolves around dryland wheat farming, by supporting initiatives and/or programs that will continue to facilitate the health of this particular agricultural community through their implementation. MCEDD will administer the investment fund pursuant to a Memorandum of Understanding.

5.7.1.3 Substantial Solar Energy Generation Capacity with No Impacts to High-Value Farmland or Irrigation Water Rights

The Applicant has designed the Solar Facility to intentionally avoid the specific agricultural resources Oregon has identified as deserving the highest level of protection. Importantly, and consistent with Goal 3, the Solar Facility and shared components will not use, occupy, or cover any high-value farmland or impact any irrigation resources in this water scarce region. See Section 3.3.2.

Avoiding high-value farmland and irrigation water rights is significant from a Goal 3 perspective. Water rights on agricultural lands for a proposed solar facility site and for underlying tracts inform the evaluation of soil classification, soil suitability for agricultural use, and irrigation history (ODOE 2024). Within the Facility site boundary the agricultural lands with historic or current water rights may have a higher soil classification when irrigated and therefore would be potentially suitable for a higher value per acre for agricultural use. Conversely, agricultural lands without water rights will have a lower soil classification and have a lower value per acre for agricultural use (ODOE 2024).

By designing the micrositing area to avoid areas subject to all place-of-use water rights, the Solar Facility is consistent with Goal 3's emphasis on preservation of key agricultural resources and long-term agricultural health of the region, where water is scarce.

As provided by the preliminary site design, the lands selected for the Solar Facility are generally unsuitable for the production of farm crops and livestock, considering adverse soil or land conditions such as the arid climate and lack of irrigation. Thus, the Solar Facility avoids impacts to the agricultural resources that are most directly protected by Goal 3. As noted by several landowners in their survey responses, the land in wheat cultivation has average yields of 37.5 bushels per acre, which is notably lower than the 10-year countywide normalized average of 51 bushels per acre (see Attachment D-1). Furthermore, landowners identified portions of their tracts for the Facility lease areas that are less productive/less suitable for farm crops and livestock. These landowners seek to maximize the profitability of their lands and therefore worked with the Applicant to exclude the more productive/more suitable portions of agricultural lands in their holdings from the Facility leases. The areas being leased to the Facility are described by many landowners as highly erodible and limited in production due to soil depth and precipitation and lack of irrigation. While the Solar Facility will impact farming practices within the Goal 3 Exception Area, through the implementation of the Agricultural Investment Plan (see Attachment D-3) described in Section 5.7.1.2, the discontinuation of these practices would have minimal indirect or induced impacts on the local agricultural economy.

That the Solar Facility can provide substantial energy generation while avoiding permanent impacts to high-value farmland and irrigation resources is significant, unique, and warrants an exception from Goal 3.

5.7.2 Evidence that Environmental, Socioeconomic, and Energy Consequences Favor the Exception

ORS 469.504(2)(c)(B); OAR 345-022-0030(4)(c)(B) The significant environmental, economic, social and energy consequences anticipated as a result of the proposed facility have been identified and adverse impacts will be mitigated in accordance with rules of the Council applicable to the siting of the proposed facility;

Response: This section addresses the environmental, economic, social, and energy-related consequences anticipated as a result of the construction and operation of the Solar Facility.

- **Environmental**
    - EFSC standards, rules and statutes include the Soil Protection standard; Protected Areas standard; Recreation Standard; Scenic Resources standard; Fish and Wildlife Habitat standard; and the Threatened and Endangered Species standard. Compliance with these standards have been provided by Exhibit C (Soil Protection), Exhibit O1 (Wetlands and Other Waters), Exhibit I (Protected Areas), Exhibit G (Fish and Wildlife Habitats), Exhibit H (Threatened and Endangered Species), Exhibit R (Scenic Resources), and Exhibit S (Historic, Cultural, and Archaeological Resources). These exhibits demonstrate that the Solar Facility will not cause significant adverse environmental consequences. Overall, the proposed changes will avoid impacts to such resources altogether. The Applicant will mitigate for unavoidable impacts to wildlife habitat consistent with ODFW recommendations. The Applicant has coordinated with ODFW to determine mitigation needs for the Facility as a whole. The mitigation ratios proposed in the Draft HMP (Attachment G-2 to Exhibit G) were established with input from ODFW. Thus, the Solar Facility, as proposed, is not anticipated to have any significant adverse impacts to soils, wetlands, protected areas, water resources, fish and wildlife habitat and species, threatened and endangered species, scenic and aesthetic resources, and historic, cultural, and archaeological resources.
- **Socioeconomic**
    - Impacts to public social services such as sewers and sewage treatment, water, storm water drainage, solid waste management, housing, traffic safety, policy and fire protection, health care of schools are discussed in Exhibit L (Public Services), Exhibit O2 (Water Use), and Exhibit N (Waste Minimization). These exhibits have demonstrated that the Solar Facility will not have significant adverse socioeconomic impacts on these services.
    - As discussed in Section 5.7.1 above, the removal of up to 8,500 acres of arable land will have no measurable impacts to the local economy through the implementation of the Agricultural Investment Plan (Attachment D-3). This plan proposes to mitigate potential agricultural economic impacts by making meaningful investments in the local agricultural economy that will in turn continue to spur agricultural economic health through the implementation of the programs supported. These investments will be implemented as described in the Agricultural Investment Plan, which provides the methods for how the Solar Facility will mitigate negative economic impacts to the local agricultural economy, thereby making the agricultural economy whole in addition to the broader economic benefits offered by construction and operation of the Solar Facility. The Applicant anticipates the Agricultural Investment Plan will result in a net economic benefit to the Sherman County local agricultural economy.

- As discussed in the Economic Impact Analysis, Attachment D-2, the Solar Facility is anticipated to contribute substantial benefits to the local economy. The Solar Facility is expected to generate substantial short-term economic activity during construction and provide sustained, long-term economic contributions during operations, supporting employment, labor income, and business activity within the broader local and regional economy. As a whole, Facility operations are expected to directly employ approximately 20 full-time workers residing within the local area, with aggregate wages and benefits estimated at approximately $2.2 million annually. Economic benefits of the Facility, including the Solar Facility, are evidenced through the detailed evaluation in Attachment D-2.
- For the foregoing reasons, including the mitigation of potential economic impacts to the Sherman County agricultural economy through the Agricultural Investment Plan, the Solar Facility does not impose significant adverse economic consequences but rather would provide economic benefits to the county.

- **Energy**
  - As discussed in the Background Information Exhibit, the Facility will technically have a nominal generating capacity[16] of up to 1,800 MW (1,400 MW from solar and 400 MW from wind) and an average electrical generating capacity of 1,533 MW (1,400 MW from solar and 133 MW from wind).[17] As a result, the Solar Facility will contribute up to 1,400 MW of renewable, emissions-free energy.
  - The Solar Facility will support the generation of reliable renewable energy for sale to the public and improve the reliability of the local electric grid, and while doing so, promote the goals of Sherman County, as well as Oregon's Renewable Portfolio Standard and Clean Energy Targets bill (House Bill 2021). This bill imposes additional requirements for certain electricity providers serving electricity in Oregon to reduce the greenhouse gas emissions associated with the electricity they provide. The substantial power generation provided by the Facility helps further these important policies and outweighs removing the low suitability, non-high-value, arable land at issue here for the life of the Facility.
  - In addition to Oregon's Renewable Portfolio Standard and clean energy goals, private companies have their own renewable energy procurement policies, which increase the demand for renewable energy in Oregon. These public and private policies are intended to reduce greenhouse gas emissions, mitigate climate impact, and reduce reliance on carbon-based fuels. Solar power generation, like that proposed with the Solar Facility, helps further these public and private policies and outweighs removing up to 8,500 acres of arable land for the life of the Solar Facility.

[16] As defined by Oregon Revised Statutes (ORS) 469.300(4)(c).
[17] The project is expected to contribute up to 1,400 MW to the regional electrical grid based on the Facility's current interconnection position request.

5.7.3 Compatibility with Adjacent Land Uses

ORS 469.504(2)(c)(C); OAR 345-022-0030(4)(c)(C) The proposed facility is compatible with other adjacent uses or will be made compatible through measures designed to reduce adverse impacts.

Response: Uses adjacent to the Solar Facility consist of a mixture of agricultural production and rangeland (see Figure D-11). As provided in the analysis in response to OAR 660-033-0130(5) in Section 5.5.2.1, the potential impacts to farm practices and operations, such as traffic, water availability and delivery, weeds and pests, damage to crops or livestock, litter and trespassing, reduction in crop yields, flooding, dust and erosion, and fire risk are minimal or will be mitigated such that the impacts are not significant. There are no unique farm practices within the surrounding lands requiring special site conditions that would be at risk due to the proposed Facility.

As a result of the proposed Agricultural Investment Plan that will be managed by the Mid-Columbia Economic Development District (MCEDD) in partnership with Sherman County, in addition to the soil protection methods provided by Exhibit C, habitat and wildlife protections and mitigation provided by Exhibit G, the coordination and management plans provided by Exhibit L, and fire prevention and mitigation methods described by Exhibit M, the Solar Facility is not likely to interfere with accepted farm practices on surrounding lands.

6.0 Federal Land Management Plans – OAR 345-022-0030(7)(b)(D)

(D) If the proposed facility will be located on federal land:

(i) Identify the applicable land management plan adopted by the federal agency with jurisdiction over the federal land;

(ii) Explain any differences between state or local land use requirements and federal land management requirements;

(iii) Describe how the proposed facility complies with the applicable federal land management plan;

(iv) Describe any federal land use approvals required for the proposed facility and the status of application for each required federal land use approval;

(v) Provide an estimate of time for issuance of federal land use approvals; and

(vi) If federal law or the land management plan conflicts with any applicable state or local land use requirements, explain the differences in the conflicting requirements, state whether the applicant requests Council waiver of the land use standard described under paragraph (B) or (C) of this subsection and explain the basis for a waiver.

Response: The Facility is not located on lands with an applicable federal management plan. Therefore, the standards of OAR 345-022-0030(7)(b)(D) do not apply.

7.0 Materials Analysis – OAR 345-022-0030(7)(c)

(c) A materials analysis, including:

(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;

(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and

(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.

Response: The materials analysis for the Facility can be found in Section 5.3 of the Background Information Exhibit.

8.0 References

Britannica. 2026. Rangeland. Grazing Land. Accessed June 2026. https://www.britannica.com/science/rangeland.

County (Sherman County). 2007. Sherman County 2007 Wind Power Ordinance. Ordinance No. 39-2007. Received December 2025 provided by Amy Phelps Sherman County Planning Director. Personal Communication.

County. 2017a. Sherman County Zoning Ordinance. https://www.shermancountyor.gov/233/Planning-Department. Accessed December 2025.

County. 2017b. Sherman County Comprehensive Plan. https://www.co.sherman.or.us/documents/comprehensive-land-use-plan/. Accessed December 2025.

County. 2026. Sherman County Goal 5 Significant Resource Inventory. Received March 2026 provided by Amy Phelps Sherman County Planning Director. Personal Communication.

DOGAMI (Oregon Department of Geology and Mineral Industries). 2025b. Oregon HazVu: Statewide Geohazards Viewer. https://gis.dogami.oregon.gov/maps/hazvu/. Accessed November 2025.

FEMA (Federal Emergency Management Agency). 2025a. FEMA National Flood Hazard Layer. https://www.fema.gov/national-flood-hazard-layer-nfhl. Accessed December 2025.

FEMA. 2025b. FEMA Flood Map Service Center. Accessed June 2026. https://msc.fema.gov/portal/search?AddressQuery=Sherman%20County

Google Earth. 2026. Google Earth Pro "Google Earth Imagery." Imagery Date April 2024. Accessed December 2025.

Helms, Douglas. 1992. Readings in the History of the Soil Conservation Service, Washington, DC: Soil Conservation Service, 1992, pp. 60-73.

IMPLAN. 2026. Retrieved from www.implan.com

Merriam-Webster. 2026. Dictionary: Definition of Rural. Accessed June 2026. https://www.merriam-webster.com/dictionary/rural.

NRCS (National Resources Conservation Service). 2026. Web Soil Survey. Accessed June 2026. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

ODOE (Oregon Department of Energy). 2024. Agenda Item C (Information Item): Land Use Standard (OAR 345-022-0030) – Goal 3 Exceptions (Part I) for the December 13, 2024 EFSC Meeting. November 27, 2024.

ODOE. 2026. Speedway Energy Facility Project Order, Revised. February 26, 2026, revised May 4, 2026. https://www.oregon.gov/energy/facilities/Facilities%20library/2026-05-06-SEFNOI-Amended-Project-Order-2026-05-04.pdf

ODOT (Oregon Department of Transportation). 2026. Material Source Network Map. Accessed June 2026. https://www.oregon.gov/ODOT/GeoEnvironmental/Pages/Material-Source.aspx.

OWRD (Oregon Water Resources Department). 2025. Groundwater well database: https://apps.wrd.state.or.us/apps/gw/gw_info/gw_map/Default.aspx. Accessed December 2025.

OWRD. 2026. Permit: G 17083, Water Rights Information Query. Accessed June 2026. https://apps.wrd.state.or.us/apps/wr/wrinfo/wr_details.aspx?snp_id=176907.

USDA (U.S. Department of Agriculture). 2022a. County Profile. Retrieved from National Agricultural Statistics Service: https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Oregon/cp41055.pdf.

USDA. 2022b. Oregon Ag Census. Retrieved from National Agricultural Statistics Service: https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Oregon/cp99041.pdfUSDA. 2026a.

USDA. 2022c. 2022 Census of Agriculture. National Agricultural Statistics Service. Available online at: https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Census_by_State/Oregon/

USDA. 2026a. Rural Classifications - What is Rural? Accessed June 2026. https://www.ers.usda.gov/topics/rural-economy-population/rural-classifications/what-is-rural.

USDA. 2026b. Yields of Non-Irrigated Crops, Winter Wheat, Sherman County OR. Accessed June 2026. https://websoilsurvey.nrcs.usda.gov/app/.

USDA FSA (Farm Service Agency). 2020-2031. Conservation Reserve Program Statistics, CRP Contract Expirations by County, 2020-2031. Retrieved from Farm Service Agency U.S. Department of Agriculture: https://www.fsa.usda.gov/resources/programs/conservation-reserve-program/statistics

USDA FSA. 2022. Conservation Reserve Program (CRP) Statistics, CRP Enrollment and Rental Payments by County, 1986-2022. Retrieved from Farm Service Agency U.S. Department of Agriculture: https://www.fsa.usda.gov/resources/programs/conservation-reserve-program/statistics

USDA FSA. 2026a. Grassland Conservation Reserve Program (CRP). Accessed May 2026. https://www.usda.gov/sites/default/files/guidance-documents/FSA.Grassland-CRP-208-05-2026.pdf

USDA FSA. 2026b. Conservation Reserve Program Statistics, CRP Contract Expirations by County, 2020-2031. Accessed June 2026. https://www.fsa.usda.gov/resources/programs/conservation-reserve-program/statistics

USDA NRCS Web Soil Survey, 2026. Yields of Non-Irrigated Crops, Winter Wheat, Sherman County, OR. Retrieved from National Cooperative Soil Survey: https://websoilsurvey.nrcs.usda.gov/app/

U.S. Census Bureau. 2024. QuickFacts. https://www.census.gov/quickfacts/fact/table/US/PST045222

Wikner, Emily. 2026. Conference Call with Applicant, Tetra Tech, and Sherman County Roadmaster Mark Coles. May 19, 2026.

9.0 Approval Standards and Submittal Requirements

Table D-10. Approval Standards and Submittal Requirements Matrix

Requirements	Location
OAR 345-022-0030 Land Use	–
Approval Standards	
(1) To issue a site certificate, the Council must find that the proposed facility complies with the statewide planning goals adopted by the Land Conservation and Development Commission.	-
(2) The Council shall find that a proposed facility complies with section (1) if:	-
(a) The applicant elects to obtain local land use approvals under ORS 469.504(1)(a) and the Council finds that the facility has received local land use approval under the acknowledged comprehensive plan and land use regulations of the affected local government; or	-
(b) The applicant elects to obtain a Council determination under ORS 469.504(1)(b) and the Council determines that:	-

Requirements	Location
(A) The proposed facility complies with applicable substantive criteria as described in section (3) and the facility complies with any Land Conservation and Development Commission administrative rules and goals and any land use statutes directly applicable to the facility under ORS 197.646(3);	-
(B) For a proposed facility that does not comply with one or more of the applicable substantive criteria as described in section (3), the facility otherwise complies with the statewide planning goals or an exception to any applicable statewide planning goal is justified under section (4); or	-
(C) For a proposed facility that the Council decides, under sections (3) or (6), to evaluate against the statewide planning goals, the proposed facility complies with the applicable statewide planning goals or that an exception to any applicable statewide planning goal is justified under section (4).	-
(3) As used in this rule, the "applicable substantive criteria" are criteria from the affected local government's acknowledged comprehensive plan and land use ordinances that are required by the statewide planning goals and that are in effect on the date the applicant submits the application. If the special advisory group recommends applicable substantive criteria, as described under OAR 345-015-0180, the Council shall apply them. If the special advisory group does not recommend applicable substantive criteria, the Council shall decide either to make its own determination of the applicable substantive criteria and apply them or to evaluate the proposed facility against the statewide planning goals.	-
(4) The Council may find goal compliance for a proposed facility that does not otherwise comply with one or more statewide planning goals by taking an exception to the applicable goal. Notwithstanding the requirements of ORS 197.732, the statewide planning goal pertaining to the exception process or any rules of the Land Conservation and Development Commission pertaining to the exception process, the Council may take an exception to a goal if the Council finds:	-
(a) The land subject to the exception is physically developed to the extent that the land is no longer available for uses allowed by the applicable goal;	-
(b) The land subject to the exception is irrevocably committed as described by the rules of the Land Conservation and Development Commission to uses not allowed by the applicable goal because existing adjacent uses and other relevant factors make uses allowed by the applicable goal impracticable; or	-
(c) The following standards are met:	-
(A) Reasons justify why the state policy embodied in the applicable goal should not apply;	-
(B) The significant environmental, economic, social and energy consequences anticipated as a result of the proposed facility have been identified and adverse impacts will be mitigated in accordance with rules of the Council applicable to the siting of the proposed facility; and	-
(C) The proposed facility is compatible with other adjacent uses or will be made compatible through measures designed to reduce adverse impacts.	-
(5) If the Council finds that applicable substantive local criteria and applicable statutes and state administrative rules would impose conflicting requirements, the Council shall resolve the conflict consistent with the public interest. In resolving the conflict, the Council cannot waive any applicable state statute.	-

Requirements	Location
(6) If the special advisory group recommends applicable substantive criteria for an energy facility described in ORS 469.300(11)(a)(C) to (E) or for a related or supporting facility that does not pass through more than one local government jurisdiction or more than three zones in any one jurisdiction, the Council shall apply the criteria recommended by the special advisory group. If the special advisory group recommends applicable substantive criteria for an energy facility described in ORS 469.300(11)(a)(C) to (E) or a related or supporting facility that passes through more than one jurisdiction or more than three zones in any one jurisdiction, the Council shall review the recommended criteria and decide whether to evaluate the proposed facility against the applicable substantive criteria recommended by the special advisory group, against the statewide planning goals or against a combination of the applicable substantive criteria and statewide planning goals. In making the decision, the Council shall consult with the special advisory group, and shall consider:	-
(a) The number of jurisdictions and zones in question;	-
(b) The degree to which the applicable substantive criteria reflect local government consideration of energy facilities in the planning process; and	-
(c) The level of consistency of the applicable substantive criteria from the various zones and jurisdictions.	-
Submittal Requirements	
(7) To assist the Council in determining whether the standard outlined in (1) through (6) has been met, the Applicant must submit:	–
(a) Information about the proposed facility's compliance with the statewide planning goals adopted by the Land Conservation and Development Commission, providing evidence to support a finding by the Council as required by OAR 345-022-0030.	Section 2.0
(b) The applicant must state whether the applicant elects to address the Council's land use standard by obtaining local land use approvals under ORS 469.504(1)(a) or by obtaining a Council determination under ORS 469.504(1)(b). An applicant may elect different processes for an energy facility and a related or supporting facility but may not otherwise combine the two processes. Once the applicant has made an election, the applicant may not amend the application to make a different election. In this subsection, "affected local government" means a local government that has land use jurisdiction over any part of the proposed site of the facility. In the application, the applicant must:	Section 3.0
(A) Include a map showing the comprehensive plan designations and land use zones in the analysis area;	Section 3.1
(B) If the applicant elects to obtain local land use approvals:	Section 3.2
(i) Identify the affected local governments from which land use approvals will be sought;	Section 3.2
(ii) Describe the land use approvals required in order to satisfy the Council's land use standard;	Section 3.2
(iii) Describe the status of the applicant's application for each land use approval; and	Section 3.2
(iv) Provide an estimate of time for issuance of local land use approvals.	Section 3.2
(C) If the applicant elects to obtain a Council determination on land use:	Section 3.3
(i) Identify the affected local governments;	Section 3.3

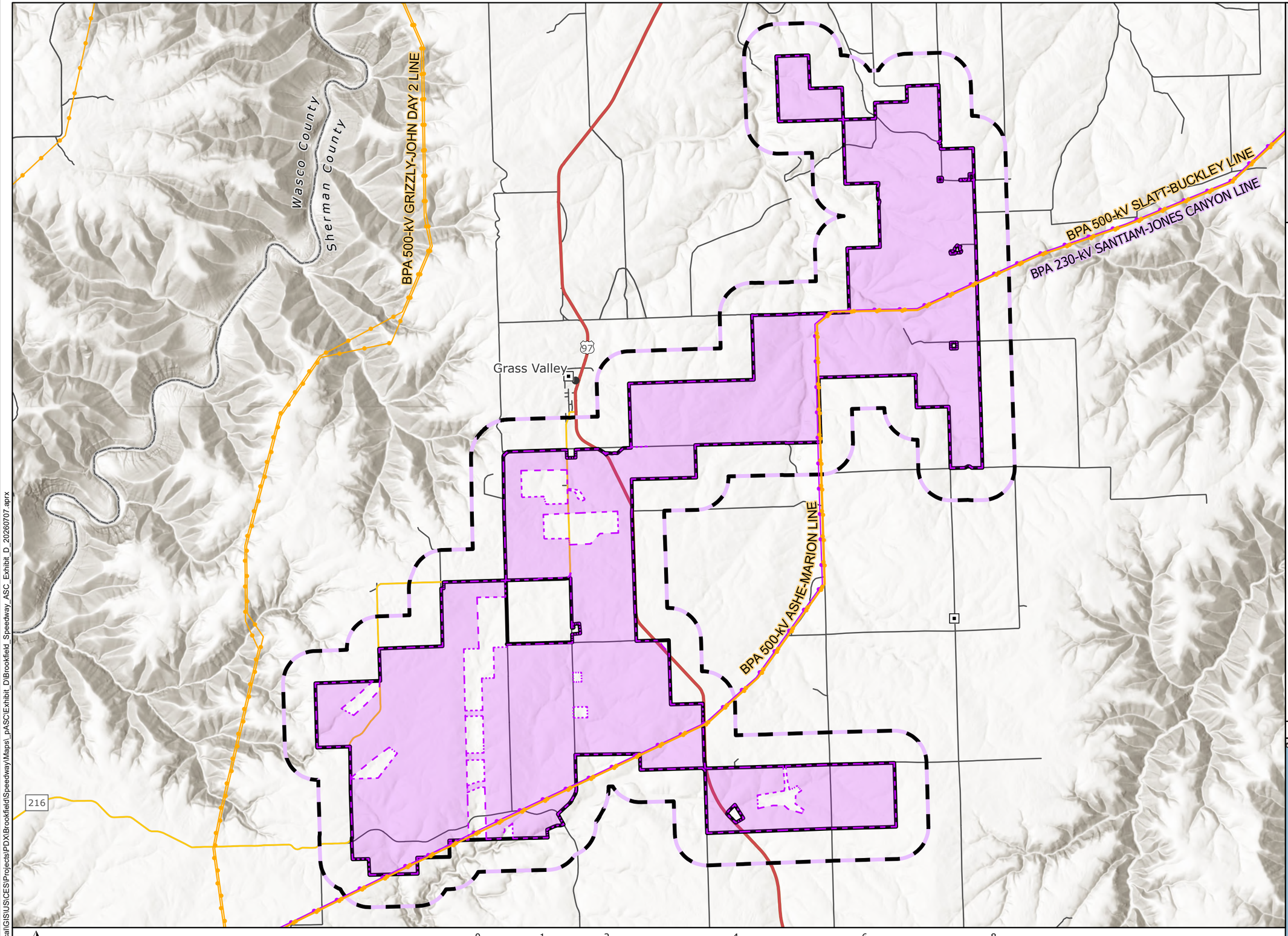
Requirements	Location
(ii) Identify the applicable substantive criteria from the affected local government's acknowledged comprehensive plan and land use regulations that are required by the statewide planning goals and that are in effect on the date the application is submitted and describe how the proposed facility complies with those criteria;	Section 3.3
(iii) Identify all Land Conservation and Development Commission administrative rules, statewide planning goals and land use statutes directly applicable to the facility under ORS 197.646(3) and describe how the proposed facility complies with those rules, goals and statutes;	Section 3.3
(iv) If the proposed facility might not comply with all applicable substantive criteria, identify the applicable statewide planning goals and describe how the proposed facility complies with those goals; and	Section 3.3
(v) If the proposed facility might not comply with all applicable substantive criteria or applicable statewide planning goals, describe why an exception to any applicable statewide planning goal is justified, providing evidence to support all findings by the Council required under ORS 469.504(2).	Section 3.3
(D) If the proposed facility will be located on federal land:	Section 4.0
(i) Identify the applicable land management plan adopted by the federal agency with jurisdiction over the federal land;	Section 4.0
(ii) Explain any differences between state or local land use requirements and federal land management requirements;	Section 4.0
(iii) Describe how the proposed facility complies with the applicable federal land management plan;	Section 4.0
(iv) Describe any federal land use approvals required for the proposed facility and the status of application for each required federal land use approval;	Section 4.0
(v) Provide an estimate of time for issuance of federal land use approvals; and	Section 4.0
(vi) If federal law or the land management plan conflicts with any applicable state or local land use requirements, explain the differences in the conflicting requirements, state whether the applicant requests Council waiver of the land use standard described under paragraph (B) or (C) of this subsection and explain the basis for a waiver.	Section 4.0
(c) A materials analysis, including:	Section 5.3 of the Background Information Exhibit
(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;	Section 5.3 of the Background Information Exhibit
(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and	Section 5.3 of the Background Information Exhibit
(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.	Section 5.3 of the Background Information Exhibit
EFSC 2-2025, amend filed 04/02/2025, effective 04/02/2025	

Figures

Speedway Energy Facility

Figure D-1 Land Use Analysis Area

SHERMAN COUNTY, OR



- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- Existing Substation

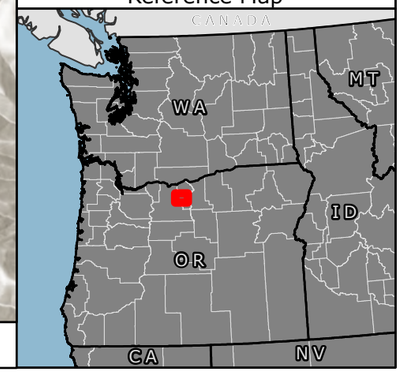
Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

TETRA TECH

Speedway Energy

Reference Map



1:90,000

WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-2 Zoning and Comprehensive Map Designations

SHERMAN COUNTY, OR

Wasco County
Sherman County
BPA 500-kV GRIZZLY-JOHN DAY 2 LINE
BPA 500-kV SLATT-BUCKLEY LINE
BPA 230-kV SANTIAM-JONES CANYON LINE
BPA 500-kV ASHE-MARION LINE
Grass Valley
97
216

- Facility Site Boundary
- Analysis Area (0.5 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- Existing Substation

Existing Transmission Lines
- 230 kV Transmission Line
- 500 kV Transmission Line
- Incorporated Town

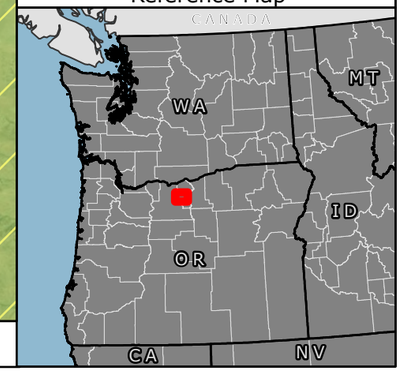
Comprehensive Plan Designations
- Cropland
- Commercial

Zoning Designations
- F-1 Exclusive Farm Use
- MSC-1 Motor Sport Complex

TETRA TECH

Speedway Energy

Reference Map



1:90,000 WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

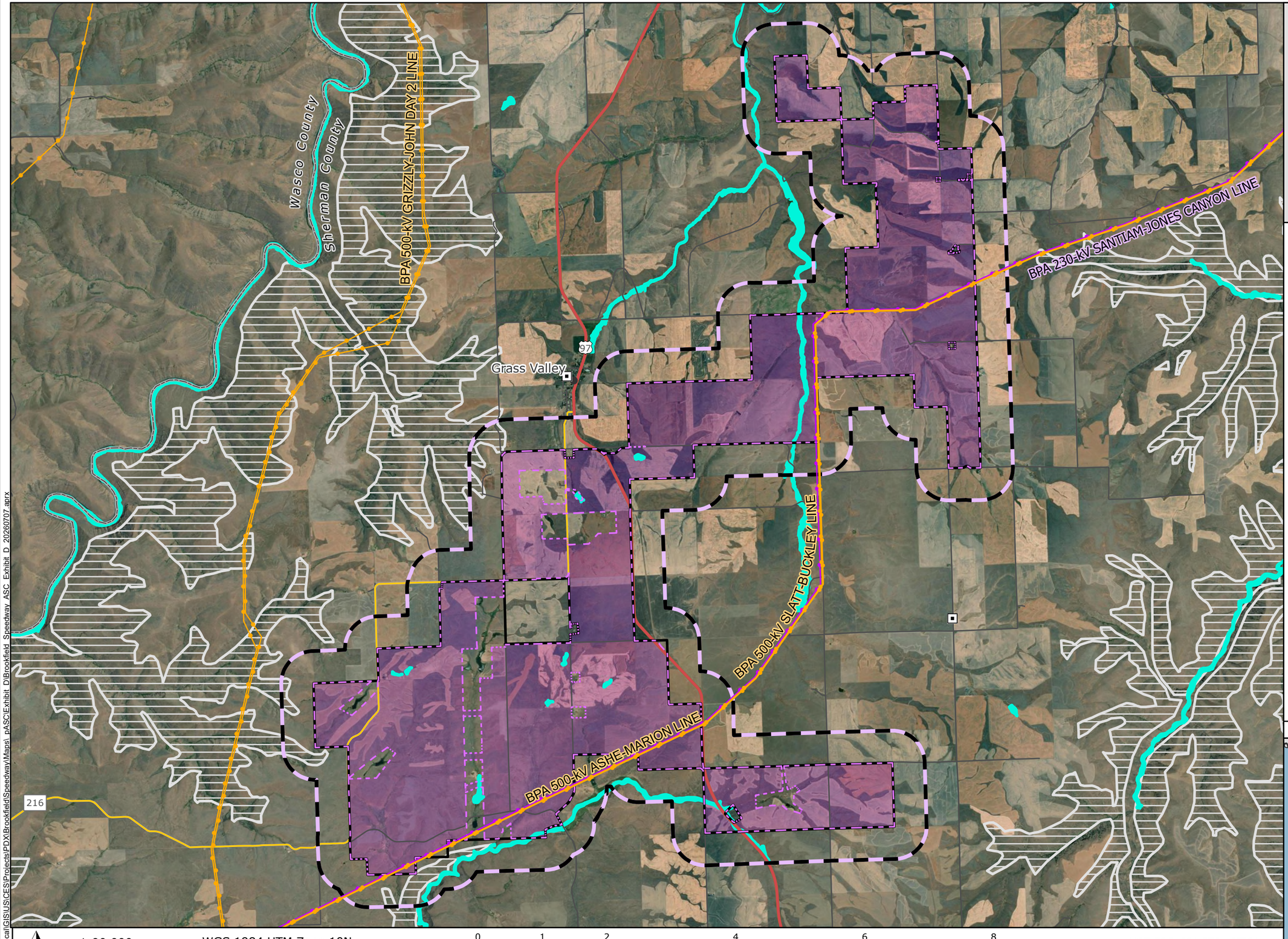
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Speedway Energy Facility

Figure D-3
Natural Hazards Combining Zone (NH)

SHERMAN COUNTY, OR



- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- Existing Substation

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

Natural Hazards Combining Zone (NH)

- Natural Hazards Combining Zone*
- 100-YR Flood Plain Boundary**

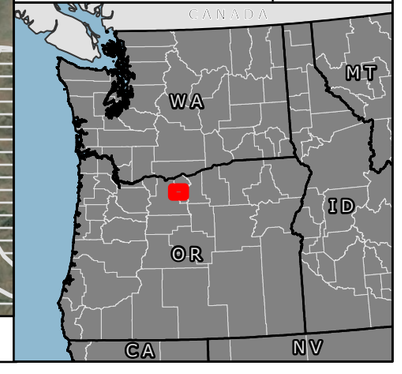
** Sherman County Comprehensive Plan/ Zoning Map, June 2007*

*** FEMA National Flood Hazard Layer, Data accessed December 2025*

TETRA TECH

Speedway Energy

Reference Map



1:90,000 WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

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Speedway Energy Facility

Figure D-4 Significant Resource Combining Zone

SHERMAN COUNTY, OR

Proposed Project Infrastructure
- Solar Array
- Solar Array Fenceline

Facility Site Boundary
Micrositing Area Boundary
City/Town
County Boundary
US Highway
State Highway
Existing Substation

Existing Transmission Lines
- 230 kV Transmission Line
- 500 kV Transmission Line

Sherman County Taxlots
- Taxlot Boundary

Sherman County Property Setbacks
- Front/Rear Yard 30-ft Setback
- Side Yard 25-ft Setback

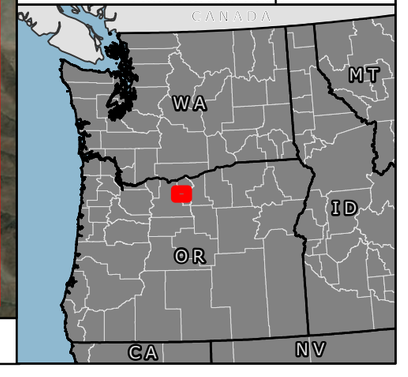
Significant Resources Combining Zone (SR)

Rock Quarries/Gravel Pits
- Significant Site

TETRA TECH

Speedway Energy

Reference Map



Detailed Map Extent 1
#25 Sherars Bridge HWY
Finnegan Rd
0 125 250 500 US Feet

Detailed Map Extent 2
#27 Bourbon Pit
0 125 250 500 US Feet

BPA 500-kV GRIZZLY-JOHN DAY 2 LINE
BPA 500-kV SLATT-BUCKLEY LINE
BPA 230-kV SANTIAM-JONES CANYON LINE
BPA 500-kV ASHE-MARION LINE
GRASS VALLEY CANYON
SEBUSH CANYON
ROSE
COTTONWOOD CANYON
SAND HOLLOW
GRIMES CANYON
FINNEGAN CANYON
Grass Valley
See Detail Map Extent 1
See Detail Map Extent 2
#25
#27
97
216

1:90,000 WGS 1984 UTM Zone 10N 0 1 2 4 6 8 Miles

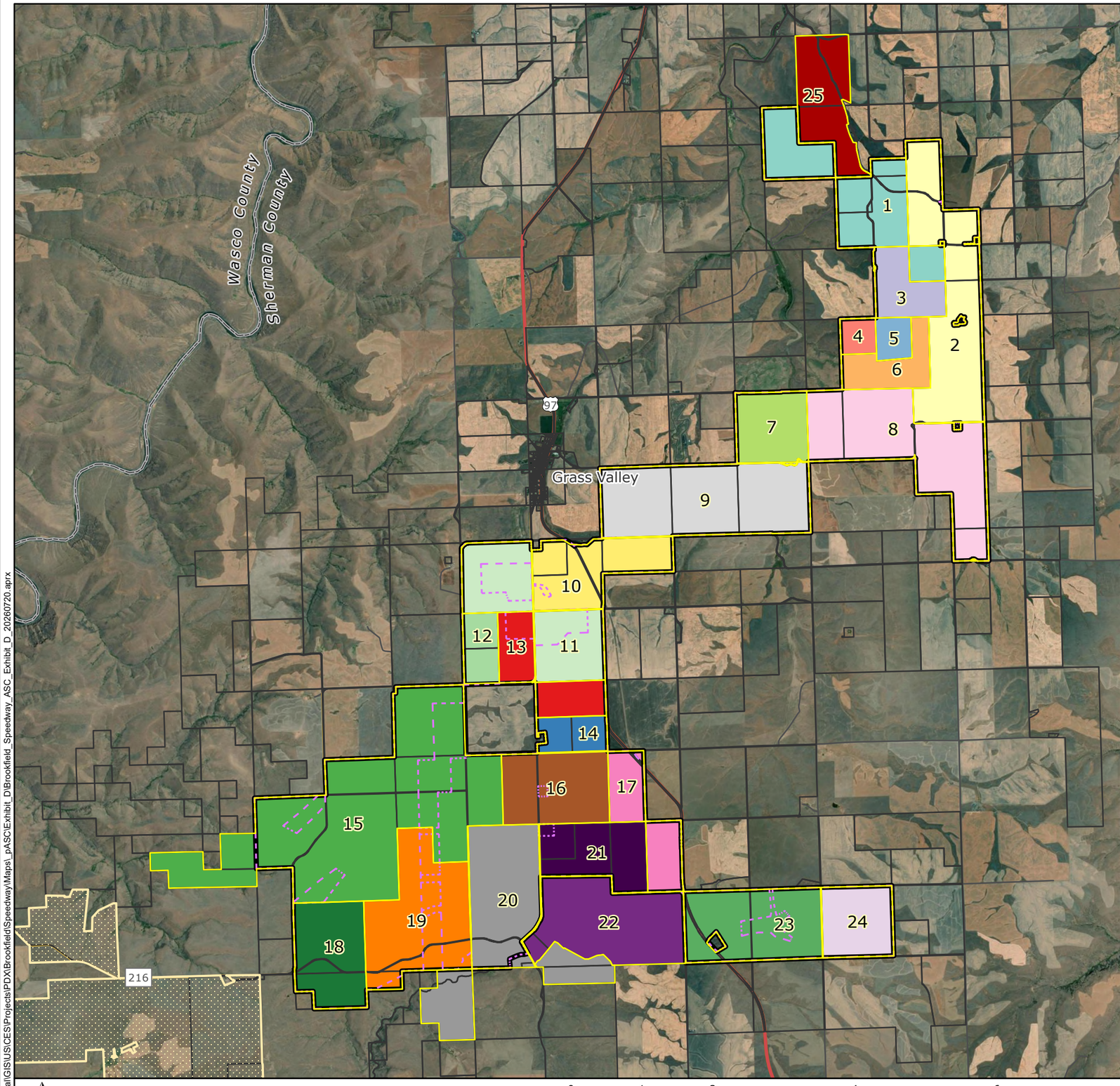
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Speedway Energy Facility

Figure D-5 Tracts and Adjacent Facilities

SHERMAN COUNTY, OR



Tract ID, Owner

- 1, POWELL, PATRICK A TRUSTEE
- 2, PINKERTON RANCH; PINKERTON RANCHES
- 3, SODERLUND, CHRISTOPHER
- 4, SODERLUND, CHRISTOPHER
- 5, SIMPSON, NANCY J & RICHARD C
- 6, CAMPBELL, STEPHEN FARM & CABIN TRUST
- 7, BARNETT, LEE
- 8, BLAGG, CARRIE L TRUSTEE
- 9, ROLFE LAND & CATTLE CO LLC
- 10, BUCK HOLLOW RANCH INC
- 11, EARL RANCH LLC
- 12, BIRD, STEVEN & LINDA
- 13, JUSTESEN, FRED & JONNIE
- 14, SALOMON, PAULINE TRUSTEE
- 15, JUSTESEN, FRED & JON; JUSTESEN, FRED & JONNIE; JUSTESEN, FRED & JONNIE L
- 16, EARL RANCH LLC
- 17, JUSTESEN, FRED; JUSTESEN FRED & JON; JUSTESEN, FRED & JUSTESEN, JON
- 18, BERGE, JAMES C ETAL
- 19, SALOMON, PAULINE TRUSTEE
- 20, RUGGLES, CATHERINE; RUGGLES, JESSE; RUGGLES, JESSE DEAN
- 21, FINNEGAN RANCH LLC
- 22, NOGLE, PAT; NOGLE, PAT & NOGLE, WHITNEY
- 23, EARL RANCH LLC
- 24, BOURBON ROAD RENEWABLES LLC
- 25, OLSEN PROPERTIES LLC

- Facility Site Boundary
- Micrositing Area Boundary
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- Sherman County Tax Lot Boundary
- Tract Boundary

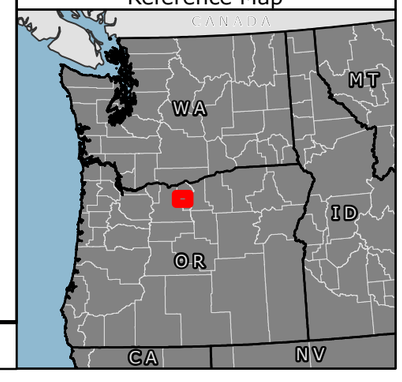
Adjacent Energy Facilities

- Buckley Solar Facility (Proposed)

TETRA TECH

Speedway Energy

Reference Map



1:95,000

WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

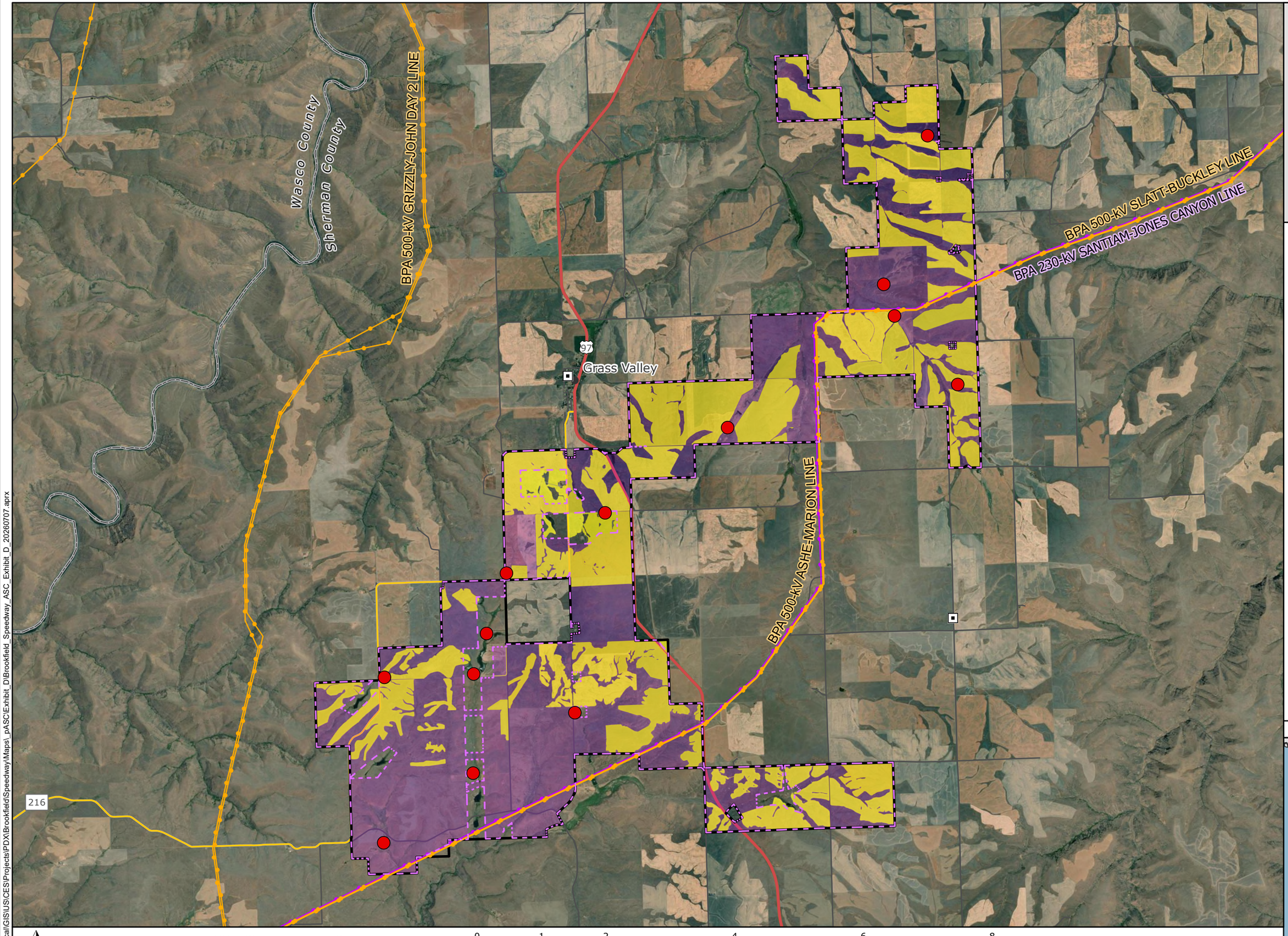
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Speedway Energy Facility

Figure D-6
Existing Land Use

SHERMAN COUNTY, OR



- Facility Site Boundary
- Micrositing Area Boundary
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- Existing Substation

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line
- Noise Sensitive Receptors (NSRs)

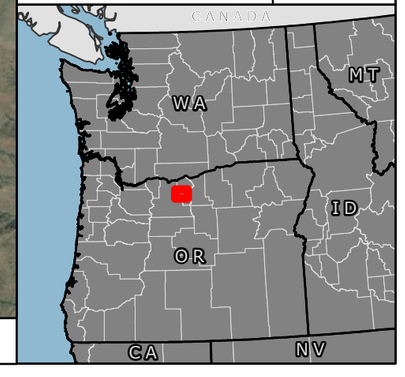
Existing Land Use

- Cultivated Land

TETRA TECH

Speedway Energy

Reference Map



1:90,000 WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

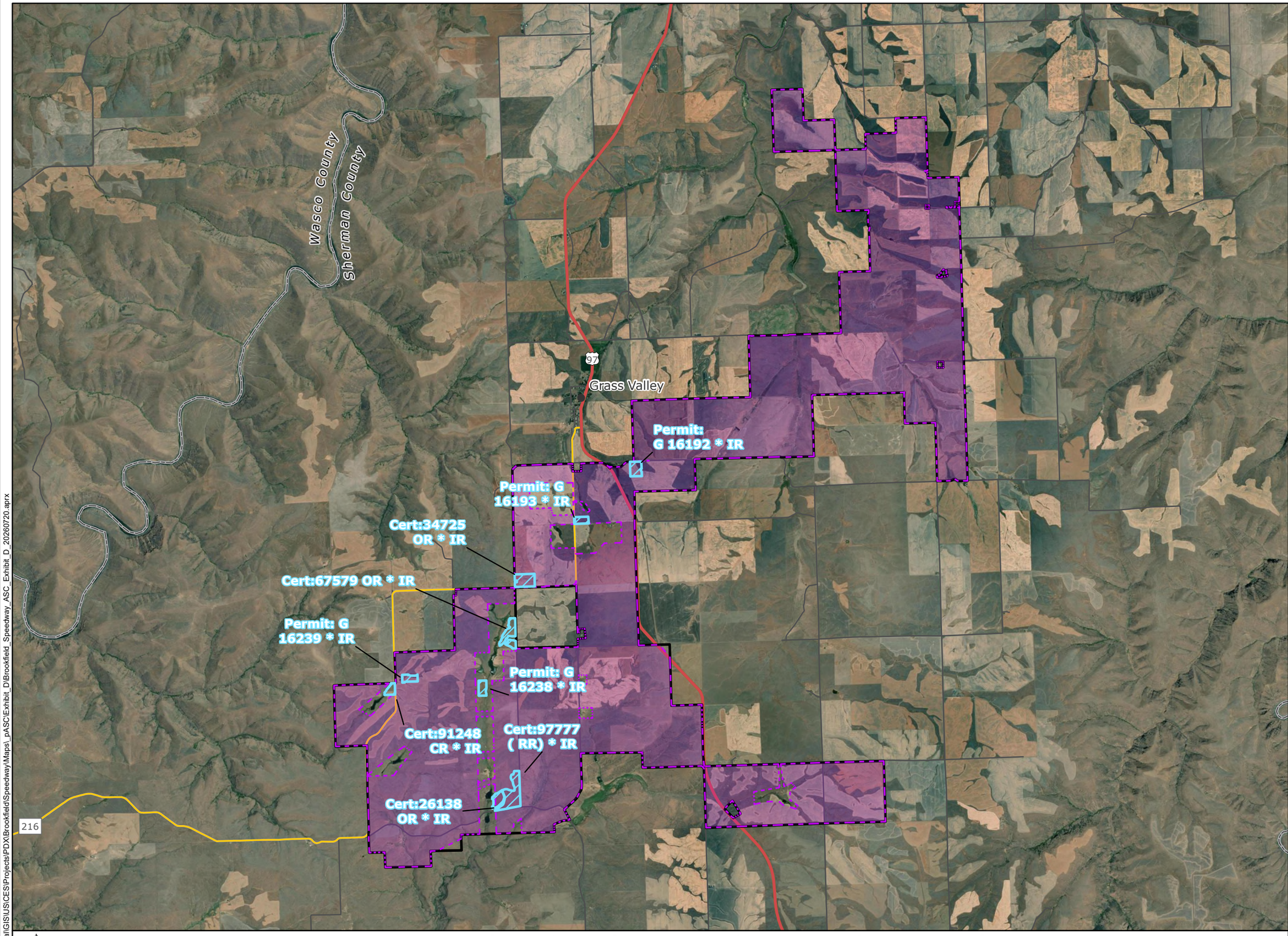
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Speedway Energy Facility

Figure D-7
Water Rights

SHERMAN COUNTY, OR



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

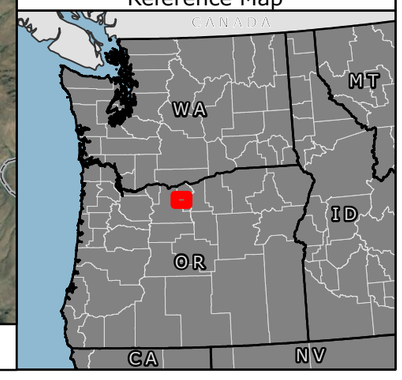
Water Right Place of Use by Use Code

- Water Rights Place of Use (Irrigation)

TETRA TECH

Speedway Energy

Reference Map



1:95,000

WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

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Speedway Energy Facility

Figure D-8 NRCS Soil Capability Classifications

SHERMAN COUNTY, OR

- Facility Site Boundary
- Micrositing Area Boundary
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- Tract Boundary

NRCS Soils Capability Classification*

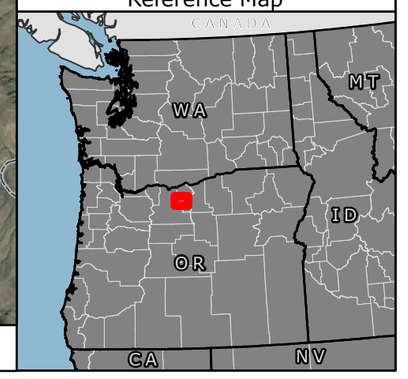
- Class I
- Class II
- Class III
- Class IV
- Class VII
- No Data (Water)

** Soil classifications represented in the figure are for non-irrigated status, with the exception of soils within a place of use water right (where irrigation classification data exist)*

TETRA TECH

Speedway Energy

Reference Map



Wasco County
Sherman County
Grass Valley
97
216
25
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

1:95,000 WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-9
High-value Farmland

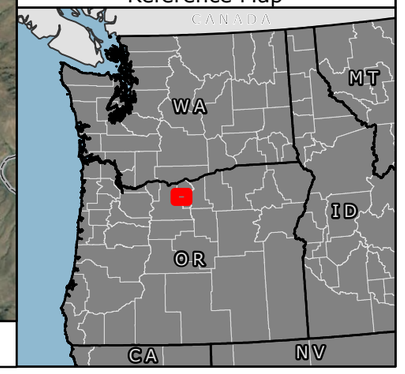
SHERMAN COUNTY, OR

- Facility Site Boundary
- Micrositing Area Boundary
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- Tract Boundary
- Columbia Valley AVA Boundary
- High-value Farmland per Columbia Valley AVA
- High-value Farmland per Irrigation Water Right

TETRA TECH

Speedway Energy

Reference Map



Wasco County
Sherman County
Grass Valley
97
216
25
1
2
3
4
5
6
7
8
9
10
11
12
13
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19
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22
23
24

1:95,000 WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-10 County Wind Turbine Setbacks

SHERMAN COUNTY, OR

Wasco County
Sherman County
Grass Valley
97
216

- Facility Site Boundary
- Proposed Turbine Locations
- Taxlot Boundary
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads
- City of Grass Valley Urban Growth Boundary

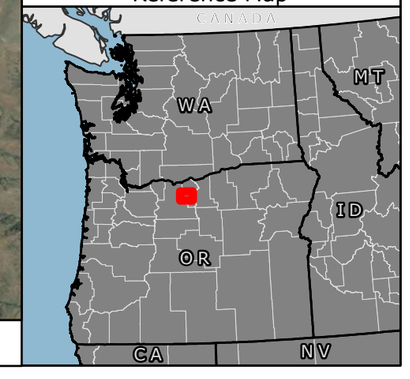
County Wind Turbine Setbacks

- 1-mile Buffer Around Urban Growth Boundary
- 1,222.5 meter East-West Turbine Setback Line
- 244.5 meter North-South Turbine Setback Line

TETRA TECH

Speedway Energy

Reference Map



1:90,000

WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11 Surrounding Lands Index Map

SHERMAN COUNTY, OR

- Figure D-11.1
- Figure D-11.2
- Figure D-11.3
- Figure D-11.4
- Figure D-11.5
- Figure D-11.6
- Figure D-11.7
- Figure D-11.8
- Figure D-11.9
- Figure D-11.10
- Figure D-11.11
- Figure D-11.12
- Figure D-11.13
- Figure D-11.14
- Figure D-11.15
- Figure D-11.16
- Figure D-11.17
- Figure D-11.18
- Figure D-11.19
- Figure D-11.20
- Figure D-11.21

BPA 500-kV MARION-JOHN DAY 2 LINE
BPA 500-kV GRIZZLY-JOHN DAY 2 LINE
BPA 500-kV SLATT-BUCKLEY LINE
BPA 230-kV SANTIAM-JONES CANYON LINE
BPA 500-kV ASHE-MARION LINE
BPA 500-kV BUCKLEY-MARION LINE

Wasco County
Sherman County
Gilliam County
Grass Valley
97
216

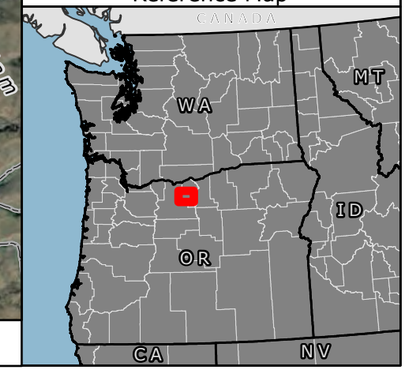
Map Grid
Facility Site Boundary
Micrositing Area Boundary
Analysis Area (0.5 mile buffer)
City/Town
County Boundary
US Highway
State Highway
Taxlot Boundary
Existing Substation

Existing Transmission Lines
- 230 kV Transmission Line
- 500 kV Transmission Line

Existing Land Use
- Cultivated Lands
- Water Rights Place of Use (Irrigation)

TETRA TECH
Speedway Energy

Reference Map



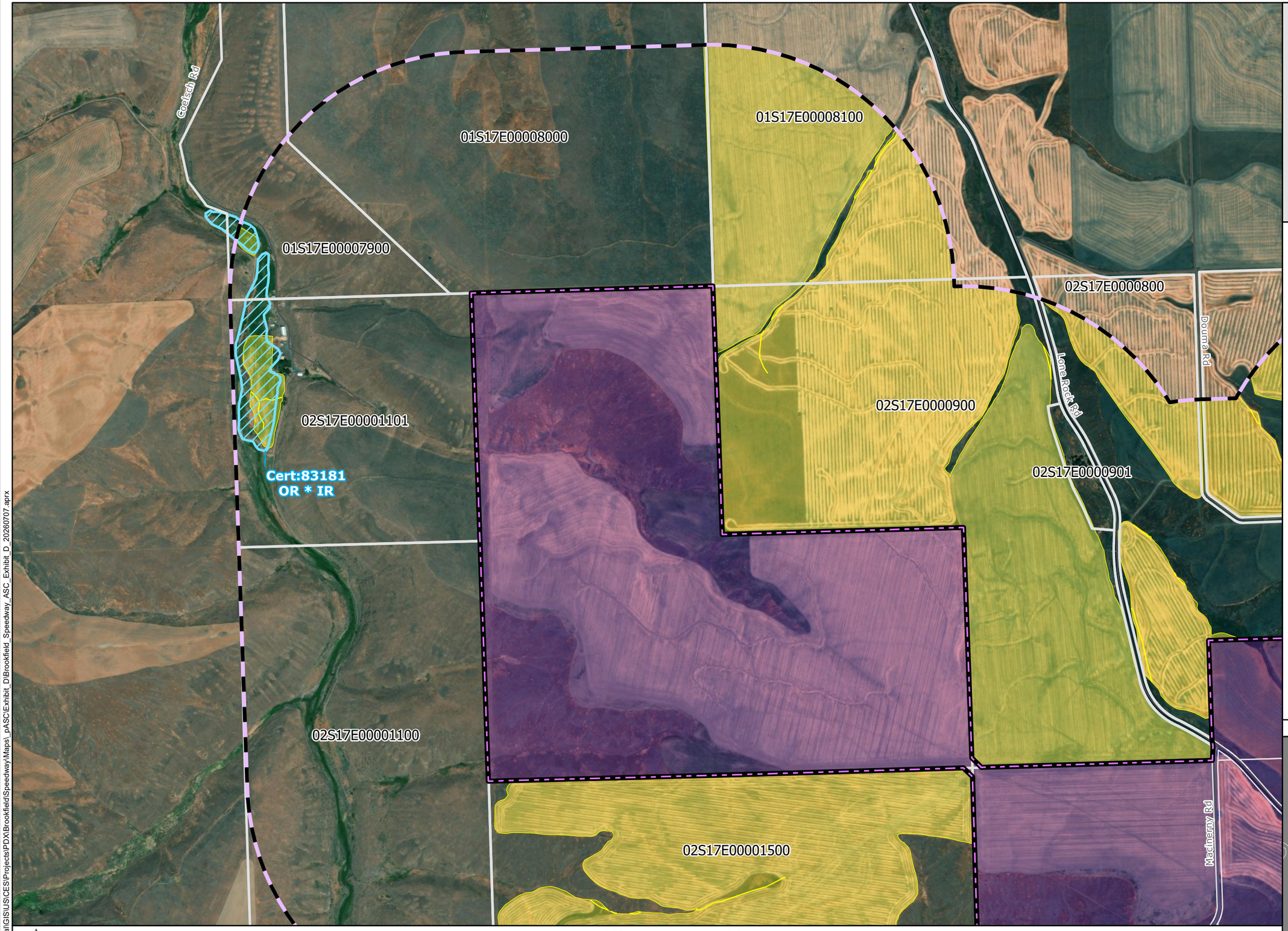
1:110,000
WGS 1984 UTM Zone 10N
0 1 2 4 6 8 Miles
NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.1 Surrounding Lands Detail Map

SHERMAN COUNTY, OR



- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

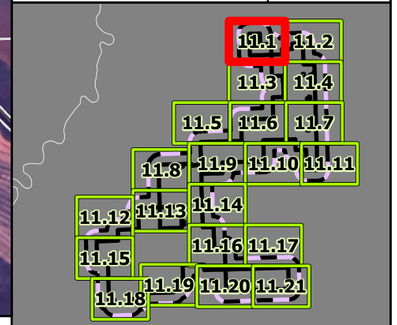
Existing Land Use

- Cultivated Lands
- Water Rights Place of Use (Irrigation)

TETRA TECH

Speedway Energy

Reference Map



1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.2 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

Existing Land Use

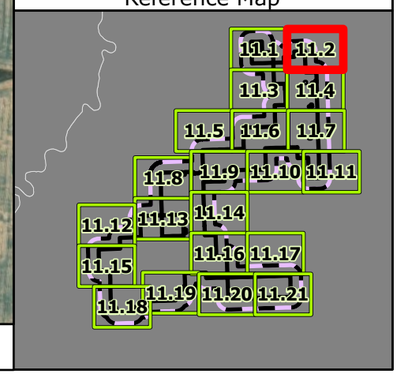
- Cultivated Lands

02S17E0000800
02S17E0000500
02S17E0000400
02S17E0000301
Douma Rd
Henrichs Rd
Fraser Rd
Lone Rock Rd

TETRA TECH

Speedway Energy

Reference Map



1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.3 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

02S17E00001100

02S17E00001500

02S17E00003000

02S17E00003400

02S17E00003600

Machenry Rd

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

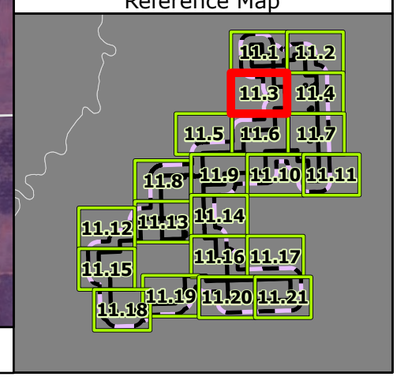
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.4 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

02S17E0000301
02S17E00001900
02S17E00001800
02S17E0000601
Fraser Rd
Hart Rd
Lone Rock Rd
Highley Loop
02S17E00002600
02S17E00002701
02S17E00004100
BPA 230-kV SANTIAM-JONES CANYON LINE
BPA 500-kV ASHE-MARION LINE
BPA 500-kV SLATT-BUCKLEY LINE

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

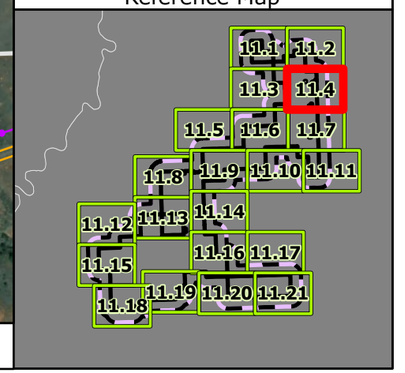
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000 WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.5 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

97
Bell Rd
Koch Loop
Koch Loop
Barnum Ln
02S17E00003400
Cert:54081
OR * IS
Mt Hood Ln
Cert:31106
OR * IR
02S16E2600200
02S16E00003400
02S17E00005200
Cert:54080
OR * IR
Permit: G
17083 * IR
N Mill St
North St
Sharp St
Grass Valley
Mill St
02S16E2600201
02S16E2600500
02S16E2600600
02S16E00005000

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- City/Town
- County Boundary
- US Highway
- Local Roads
- Taxlot Boundary
- Existing Substation

Existing Land Use

- Cultivated Lands
- Water Rights Place of Use (Irrigation)

TETRA TECH

Speedway Energy

Reference Map

11.1 11.2 11.3 11.4 11.5 11.6 11.7 11.8 11.9 11.10 11.11 11.12 11.13 11.14 11.15 11.16 11.17 11.18 11.19 11.20 11.21

1:12,000 WGS 1984 UTM Zone 10N 0 0.25 0.5 1 Miles NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.6 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

02S17E00003400

02S17E00003500

02S17E00003600

Barnum Ln

02S17E00005100

Permit: G 17083 * IR

02S17E00005200

02S17E00005500

BPA 230-kV SANTIAM-JONES CANYON LINE

BPA 500-kV ASHE-MARION LINE

BPA 500-kV SLATT-BUCKLEY LINE

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

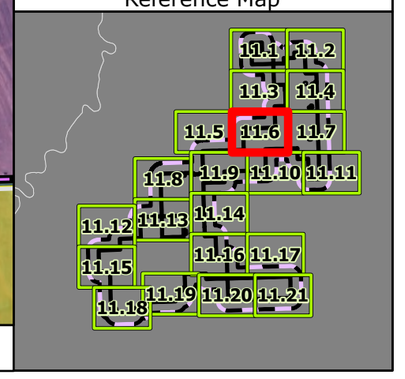
Existing Land Use

- Cultivated Lands
- Water Rights Place of Use (Irrigation)

TETRA TECH

Speedway Energy

Reference Map



1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.7 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

BPA 230-kV SANTIAM-JONES CANYON LINE

BPA 500-kV SLATT-BUCKLEY LINE

BPA 500-kV ASHE-MARION LINE

Lone Rock Rd

Smith Todd Rd

02S17E00004100

02S17E00004300

02S17E00004601

02S17E00004500

02S17E00005500

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

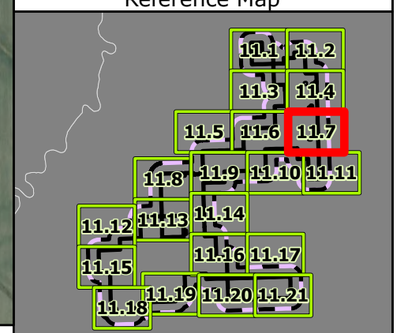
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000 WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.8 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- US Highway
- State Highway
- Local Roads
- Taxlot Boundary

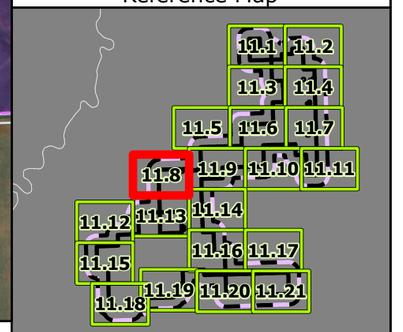
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



02S16E00004400
02S16E00004500
02S16E00004800
02S16E00005001
02S16E00005000
03S16E0200401
03S16E0000501
03S16E0000500
03S16E0000600
03S16E0000900
Sayre Rd
Stradley Rd
Sherars Bridge Hwy
SW 4th St
3rd St
97
216

1:12,000 WGS 1984 UTM Zone 10N 0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.9 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- US Highway
- Local Roads
- Taxlot Boundary

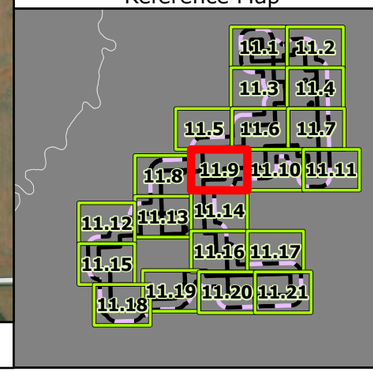
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



02S16E00005000

03S16E0200200

03S16E0000100

03S17E00001100

03S17E00001000

03S17E00001200

Rutledge Rd

Barnett Rd

97

1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.10 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

02S17E00005500

02S17E00005600

03S17E00001100

03S17E0000901

03S17E0000700

03S17E0000600

03S17E00001000

BPA 500-kV SLATT-BUCKLEY LINE

BPA 230-kV SANTIAM-JONES CANYON LINE

BPA 500-kV ASHE-MARION LINE

Rutledge Rd

Rutledge Ln

Stark Rd

Barnett Rd

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

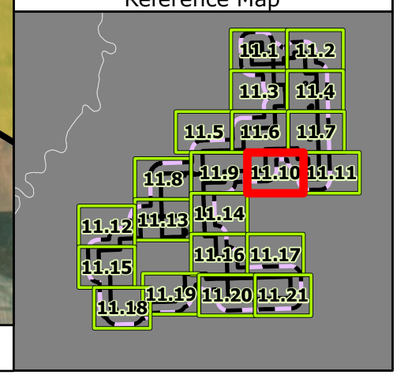
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000 WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.11 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

02S17E00005600
02S17E00004500
03S17E0000700
03S17E0000400
03S17E0000600
03S17E0000500
Lone Rock Rd
Smith Todd Rd
Horseshoe Bend Rd
Rutledge Ln
Rutledge Rd
Rosebush Ln

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

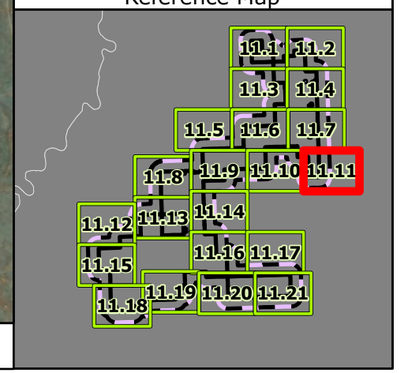
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.12 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

03S16E0000600

03S16E00002500

03S16E00002400

03S15E0000700

03S16E00002600

03S15E0000900

03S15E00002200

216

Sherars Bridge Hwy

BPA 500-kV GRIZZLY-JOHN DAY 2 LINE

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- State Highway
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 500 kV Transmission Line

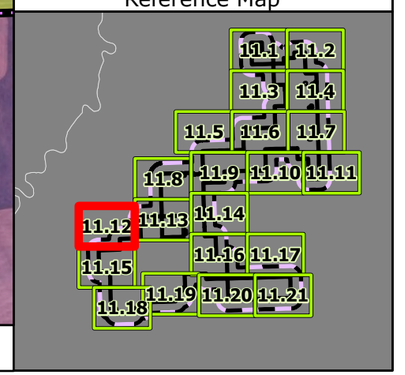
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.13 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- State Highway
- Local Roads
- Taxlot Boundary

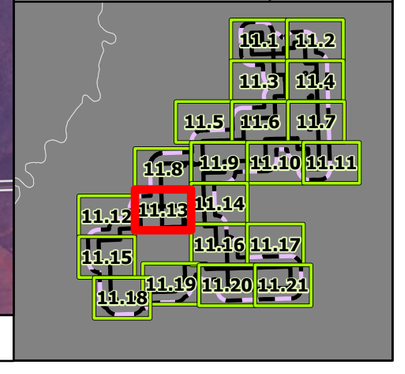
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



03S16E0000600

03S16E0000900

03S16E00002300

03S16E00002400

03S16E00002100

03S16E00002000

Buckley Rd

Stradley Rd

Sherars Bridge Hwy

216

Twin Lakes Rd

Finnegan Rd

Michigan Ln

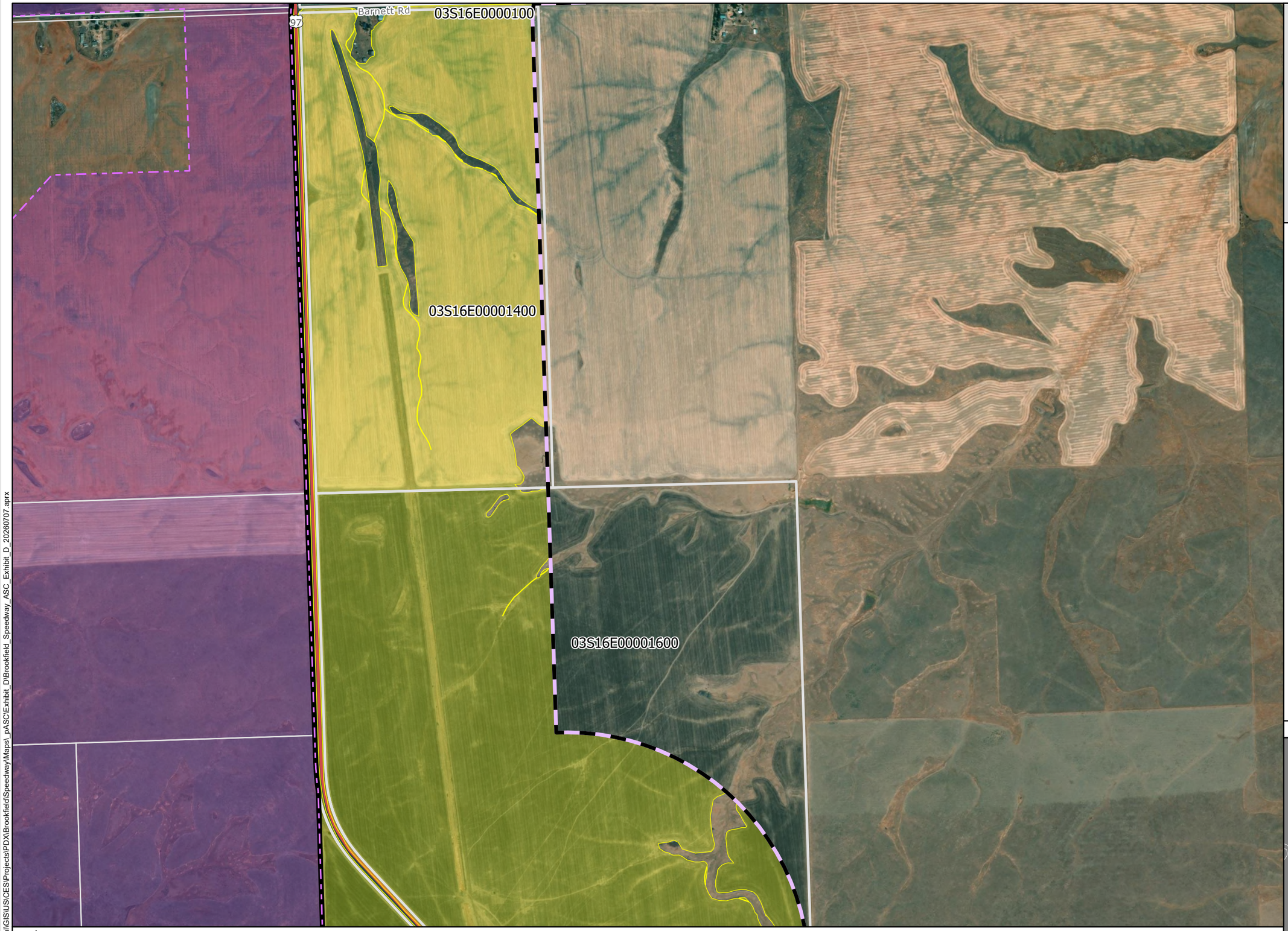
1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.14 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- US Highway
- Local Roads
- Taxlot Boundary

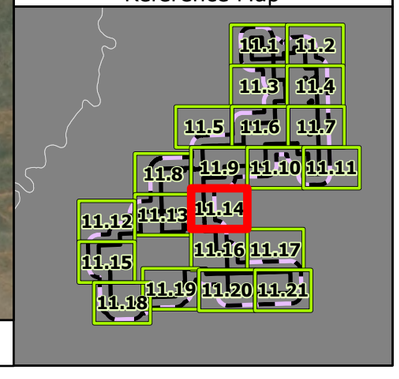
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.15 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

03S15E00002200
03S16E00002600
03S16E00002500
03S15E0000900
03S15E0000700
03S15E00002300
03S15E00002400
03S15E00002800
03S16E00004000
03S15E00002900
Sherars Bridge Hwy
216

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- State Highway
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 500 kV Transmission Line

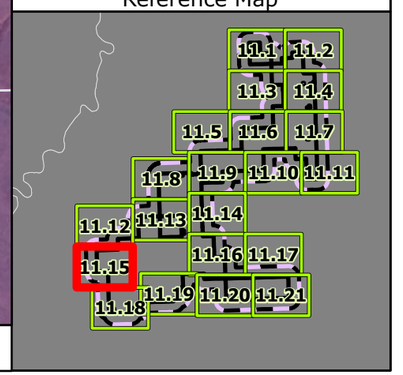
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

\\tt.local\GIS\US\CES\Projects\PDX\Brookfield\SpeedwayMaps_pASC\Exhibit_D\Brookfield_Speedway_ASC_Exhibit_D_20260707.aprx

Speedway Energy Facility

Figure D-11.16 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

03S16E00001600
Michigan Ln
97
03S16E00003300
03S17E00002800
03S17E00002700
BPA 230-kV SANTIAM-JONES CANYON LINE
BPA 500-kV ASHE-MARION LINE
BPA 500-kV SLATT-BUCKLEY LINE
03S17E00003800
03S16E00003500
03S17E00003801

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- US Highway
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

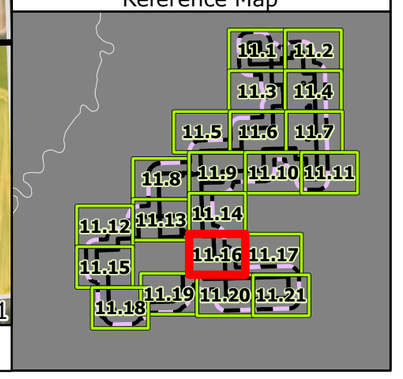
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000 WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.17 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

- Facility Site Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

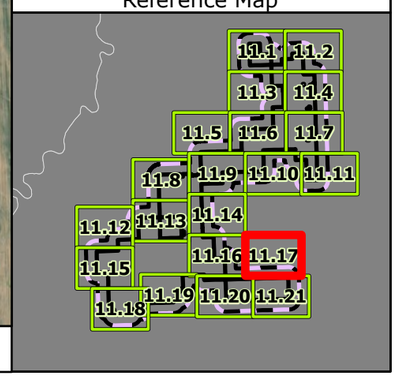
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map





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1:12,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 Miles

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Speedway Energy Facility

Figure D-11.18 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

03S16E00004000
03S15E00002900
03S16E00004100
Sherars Bridge Hwy
216
04S16E00001601
Ball Ln
04S16E0000800
04S16E0000900
BPA 230-kV SANTIAM-JONES CANYON LINE
04S16E00001500
04S16E0000600
Dugger Rd
BPA 500-kV ASHE-MARION LINE
BPA 500-kV SLATT-BUCKLEY LINE
04S16E00001000
04S16E00001200
04S16E00001600
04S16E00001100

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- State Highway
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

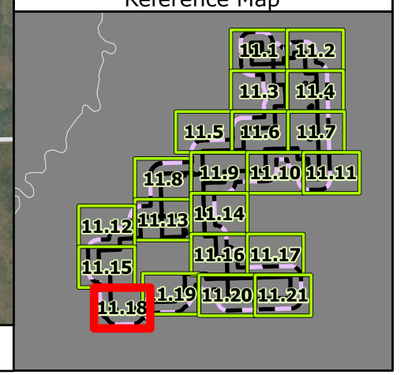
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000 WGS 1984 UTM Zone 10N 0 0.25 0.5 1 Miles NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure D-11.19 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

Twin Lakes Rd
Ball Ln
Finnegan Rd
BPA 230-kV SANTIAM-JONES CANYON LINE
BPA 500-kV SLATT-BUCKLEY LINE
BPA 500-kV ASHE-MARION LINE
03S16E00003500
03S16E00003501
03S16E00003801
03S16E00003802
03S16E00004300
04S16E0000400
04S16E0000500
04S16E0000800
04S16E0000700
04S16E00001600
04S16E0000900
04S16E0000300
04S16E0000600
04S16E00001200
04S16E00001000
04S16E0000200

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

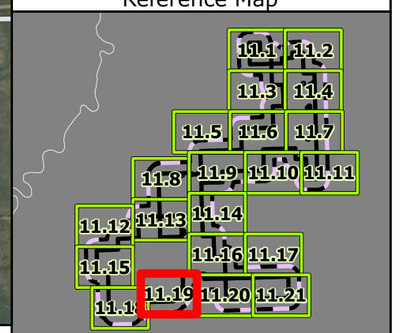
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



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Speedway Energy Facility

Figure D-11.20 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

03S17E00003800
03S17E00003801
03S17E00002800
Bourbon Ln
97
03S16E00003500
03S17E00004000
Von Borstel Rd
03S16E00004300
04S16E0000200
04S16E0000100
04S16E0000300
04S17E0000700
04S17E0000600

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- US Highway
- Local Roads
- Taxlot Boundary

Existing Transmission Lines

- 230 kV Transmission Line
- 500 kV Transmission Line

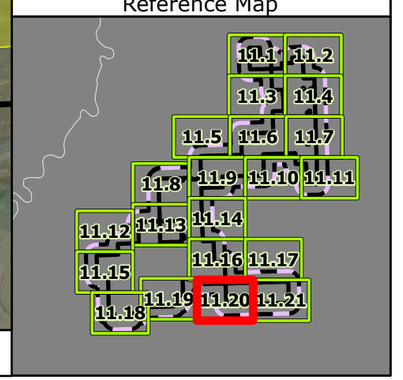
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



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Speedway Energy Facility

Figure D-11.21 Surrounding Lands Detail Map

SHERMAN COUNTY, OR

- Facility Site Boundary
- Micrositing Area Boundary
- Analysis Area (0.5 mile buffer)
- County Boundary
- Local Roads
- Taxlot Boundary

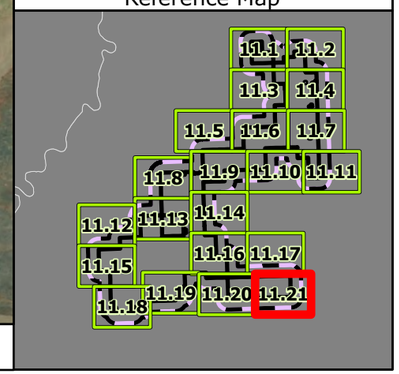
Existing Land Use

- Cultivated Lands

TETRA TECH

Speedway Energy

Reference Map



1:12,000 WGS 1984 UTM Zone 10N 0 0.25 0.5 1 Miles

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Speedway Energy Facility

Figure D-12
High-value Farmland Soils in Sherman County

SHERMAN COUNTY, OR

Klickitat County

Gilliam County

Wasco County

Sherman County

Wheeler County

- Facility Site Boundary
- County Boundary
- Interstate Highway
- US Highway
- State Highway
- County Highway

High-value Farmland Soils

- Class I
- Class II
- Prime
- Not High-value

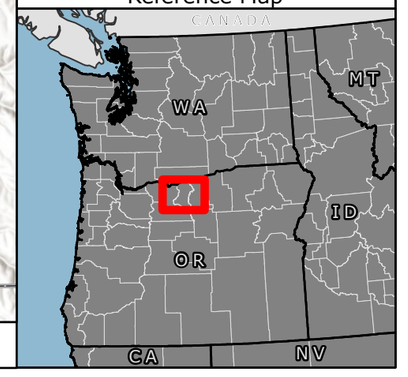
Existing/Approved Wind Facilities

- Biglow Canyon Wind Farm (Operating)
- Golden Hills Wind Project (Approved)
- Klondike III Wind Project (Operating)

TETRA TECH

Speedway Energy

Reference Map



1:300,000

WGS 1984 UTM Zone 10N

0 4 8 16 24 32 Miles

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Attachment D-1.
Agricultural Impact Analysis

ECOnorthwest

DATE:	July 1, 2026
TO:	Vince Esposito, Brookfield
FROM:	Terry Wirkkala, ECOnorthwest
SUBJECT:	Speedway Energy Facility Agricultural Impact Analysis

Executive Summary

BGTF Speedway Project LLC, a subsidiary of Brookfield Renewable N.A. (Brookfield), proposes to construct the Speedway Energy Facility (Facility), a combined solar, wind, and battery energy storage project in Sherman County, Oregon. The Facility will have a maximum injection capacity of 1,400 megawatts (MW) of alternating current (AC) electricity. The Facility also includes a battery energy storage system (BESS) with up to 1,400 MW of storage capacity, with a 4-hour duration, configured as six separate BESS areas within the site boundary.

Key Findings:

Facility Site: Approx. 24,000 Acres
Facility Limit of Disturbance: 8,048 acres
Impacted Wheat in LOD: 4,659 acres
Impacted Annual Wheat Harvest in LOD: 2,330 acres
Impacted Wheat Production Value: $534,000
Lost Ag. Econ. Activity: $232,000 (indirect economic impacts)

The Facility's site boundary encompasses approximately 24,000 acres of privately owned land zoned for exclusive farm use (EFU) and based on the preliminary layout described in the Facility's Application for Site Certificate (ASC) would result in approximately 8,048 acres of disturbance associated with the combined footprint of solar, wind, BESS, and supporting infrastructure. The preliminary layout included in the ASC is used to inform this analysis.

Agriculture is a defining component of Sherman County's economy and land use. The County is highly specialized in dryland winter wheat production, which accounts for approximately 95 percent of harvested cropland and more than 90 percent of crop sales. Agriculture supports approximately 304 jobs, generates nearly $12 million in labor income, and contributes approximately $48 million in annual economic output within the County. Wheat production is the dominant agricultural activity and represents the largest agricultural employer and source of agricultural output in Sherman County.

Landowner surveys, field surveys, and land cover analysis indicate that active agricultural production within the Facility site is primarily limited to dryland winter wheat production and cattle grazing. Within the Facility limits of disturbance (LOD), approximately 4,659 acres of winter wheat production are expected to be affected by Facility solar operations, representing approximately 2,330 harvested acres annually. Not all disturbed acreage currently supports

active crop production; portions of the disturbance area consist of grazing lands, Conservation Reserve Program (CRP) lands, and other non-crop land cover types.

Based on reported yields, harvested acreage, and normalized wheat prices, winter wheat production within the LOD generates an estimated $534,000 in annual production value. This production supports additional economic activity through purchases of seed, fertilizer, fuel, equipment, transportation, and other agricultural services within Sherman County.

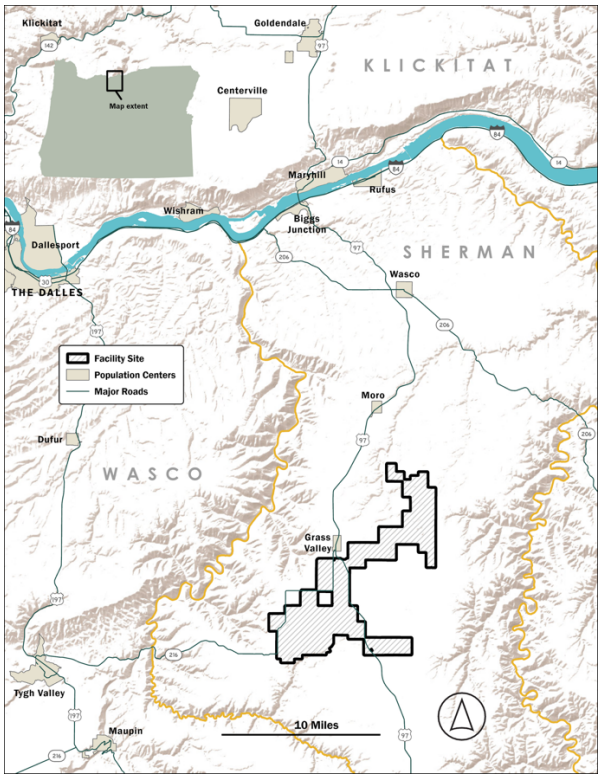
Economic impact modeling indicates that the winter wheat acreage affected by the Facility's limits of disturbance currently supports approximately 1.8 jobs, $116,000 in labor income, and $232,000 in annual economic output through indirect economic activity within Sherman County. These impacts represent the broader agricultural economic activity associated with wheat production that may be reduced if displaced production is not replaced elsewhere. The direct impacts to participating landowners are anticipated to be offset, in whole or in part, by long-term Facility lease payments.

Relative to the broader agricultural economy of Sherman County, the estimated impacts are modest. Winter wheat production within the Facility site represents approximately 1.5 percent of average countywide winter wheat production value ($34.9 million), while the economic activity potentially affected by Facility operations represents a small share of countywide agricultural employment and output. Although the affected acreage represents productive agricultural land, the scale of the impact is limited relative to the overall size of Sherman County's agricultural sector.

Introduction

BGTF Speedway Facility LLC, a subsidiary of Brookfield Renewable N.A. (Brookfield), proposes to construct the Speedway Energy Facility (Facility) near Grass Valley in Sherman County, Oregon. The Facility includes up to 1.4 GW of combined solar and wind generation capacity, a 1.4 GW battery energy storage system (BESS) and associated supporting infrastructure. The Facility's site boundary encompasses approximately 24,000 acres of privately owned land zoned for exclusive farm use (EFU) and based on the preliminary layout described in the Facility's Application for Site Certificate (ASC) would result in approximately 8,048 acres of permanent disturbance associated with the combined footprint of the solar, wind, and shared facilities within the site boundary. The preliminary layout included in the ASC is used to inform this analysis.

Exhibit 1. Speedway Energy Facility Site



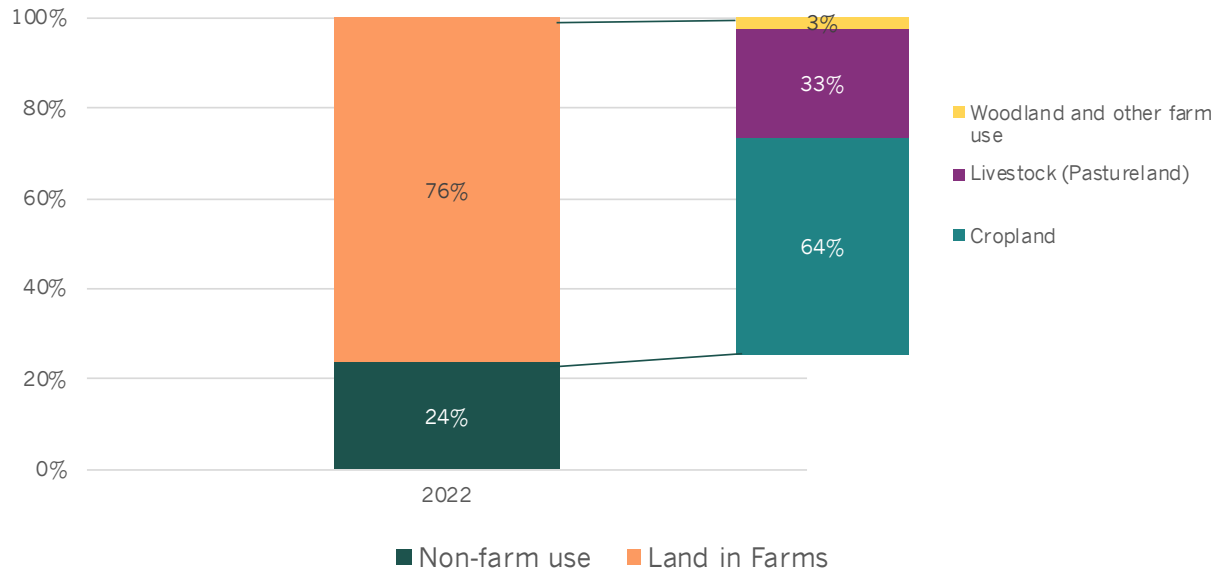
Source: (Sherman County Assessor's Office, Accessed 2025) (U.S. Census Bureau TIGER/Line Shapefiles, Accessed 2025), Brookfield Renewable U.S.

State and Local Agricultural Overview

Agriculture is the dominant land use and a defining component of the economy in Sherman County, consistent with much of Eastern Oregon. The County is highly specialized in dryland wheat production and contains some of the largest farm operations in the state. In 2022, farmland accounted for approximately 76 percent of land use within Sherman County,

compared to 25 percent statewide. Although Sherman County represents less than three percent of Oregon's total farmland acreage, agriculture plays a disproportionately important role in the County's land use and economic structure. Cropland accounts for 64 percent of farmland within the County, while pastureland represents an additional 33 percent, as illustrated in Exhibit 2 (USDA, 2022) (USDA, 2022).

Exhibit 2. Sherman County Land Use in 2022



Source: (USDA, 2022)

Sherman County's agricultural landscape is characterized by large-scale farming operations, as presented in Exhibit 3. The average farm size in Sherman County is approximately 2,327 acres, substantially larger than the statewide average of 430 acres. Most farms in the County (85 percent) are family owned. In 2022, approximately 43 percent of farms reported annual sales of less than $2,500, while 37 percent reported annual sales exceeding $100,000, notably higher than the statewide share of 13 percent (USDA, 2022) (USDA, 2022).

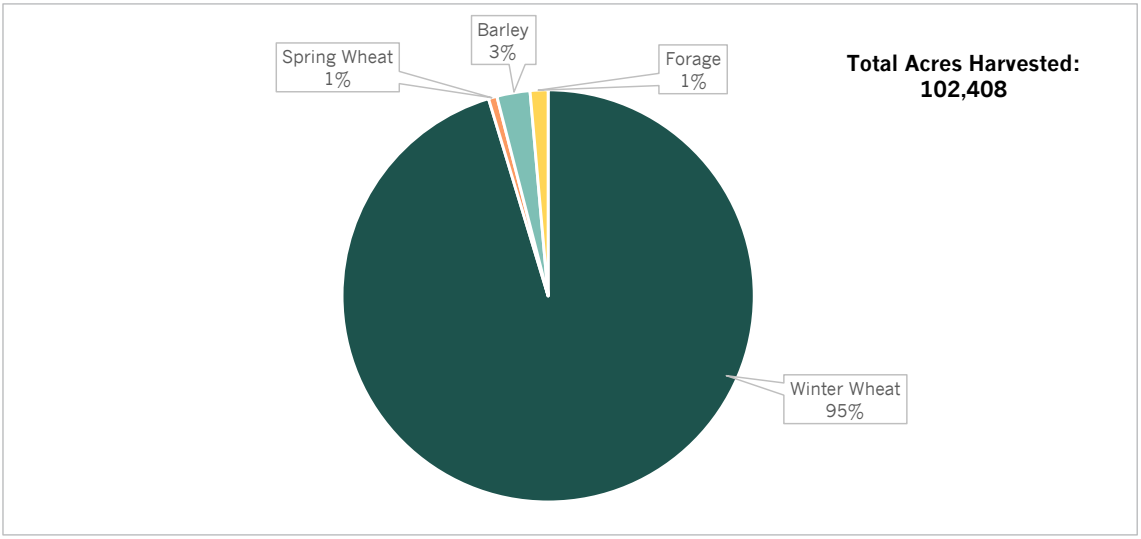
Exhibit 3. Land in Farms and Selected Crops Harvested in Sherman County, 2022

	Number of Farms	Acres
Total Farms and Farm Acres	173	402,516
Average Farm Size		2,327
Farms by value of sales		
Less than $2,500	75	
$100,000 or more	64	
Land in Farms by use		
Total Cropland	158	257,887
Harvested Cropland	97	102,408
Pastureland		131,416
Acres irrigated	20	1,045
Selected Crops Harvested		
Wheat, total for grain	83	98,884
Winter wheat for grain	82	98,195
Barley, Total for grain	12	2,677
Forage	22	1,447

Source: (USDA, 2017) (USDA, 2022)
Note: The number of farms with pastureland is not available from NASS.

Agricultural production in Sherman County is almost entirely dependent on dryland farming practices, with irrigated cropland accounting for only 0.4 percent of land in farms. Winter wheat is by far the dominant crop produced in the County, covering approximately 98,195 harvested acres and accounting for 95 percent of all harvested cropland in 2022. Sherman County alone accounted for approximately 13 percent of Oregon's total wheat production that year. Barley is the County's second-largest crop, representing 2,677 harvested acres and approximately 14 percent of statewide barley acreage. Remaining harvested cropland consists primarily of forage crops, including hay, haylage, grass silage, and green-chop production. Exhibit 4 presents the share of harvested acreage by crop type within Sherman County (USDA, 2022).

Exhibit 4. Percent of Harvested Crops by Crop Type in Sherman County, 2022

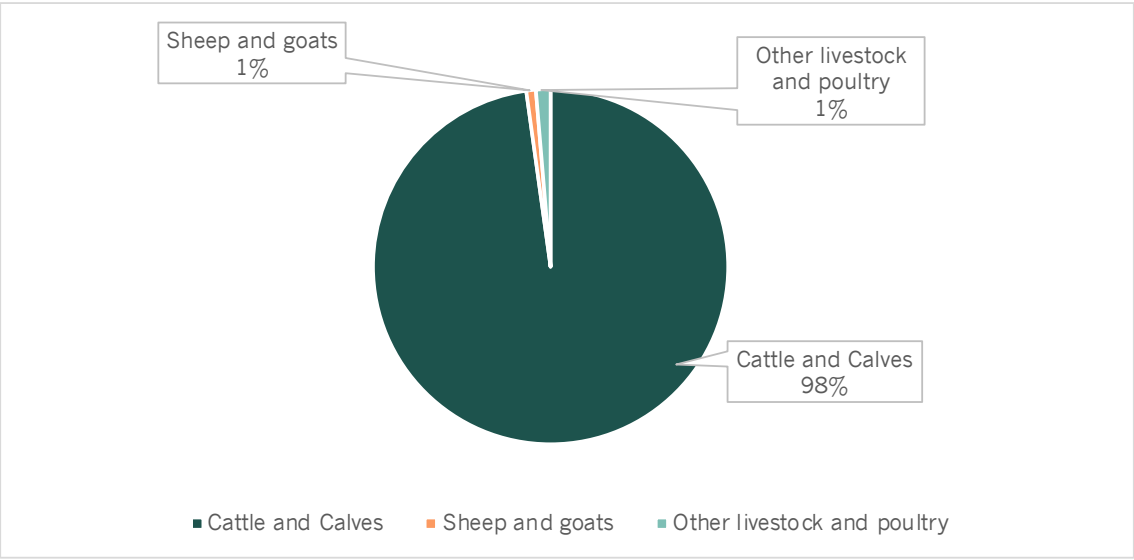


Source: (USDA, 2022)

Livestock and Poultry

Livestock and poultry production represent a relatively small component of Sherman County's agricultural economy, accounting for less than five percent of total agricultural sales in 2022. Livestock and poultry sales totaled approximately $2.4 million, ranking Sherman County 35th among Oregon's 36 counties in livestock and poultry revenue. Cattle and calves dominate livestock production within the County, accounting for approximately 98 percent of livestock-related sales revenue. The remaining livestock sales, totaling approximately $53,000 in 2022, were associated with sheep, goats, and other livestock operations (USDA, 2022). Exhibit 5 summarizes livestock and poultry sales by product category within the County.

Exhibit 5. Livestock and Poultry Sales by Product for Sherman County, 2022



Source: (USDA, 2022)

Conservation Reserve Program in Sherman County

The Conservation Reserve Program (CRP) is a voluntary USDA program that compensates landowners for converting environmentally sensitive agricultural land into conservation cover through annual rental payments. CRP rental rates are generally based on local cropland lease rates and therefore vary over time and across geographic regions.

A substantial amount of land in Sherman County is enrolled in CRP. In 2022, approximately 80,115 acres, representing roughly 15 percent of County land area, were enrolled in the program.[1] Over the period from 2012 to 2022, CRP enrollment within the County remained relatively stable, averaging approximately 77,500 acres annually. Looking forward, approximately 22,000 acres currently enrolled in CRP are scheduled to expire between 2025 and 2029, although these lands may be re-enrolled. In fiscal year 2022, Sherman County landowners received approximately $4.4 million in CRP rental payments. Average CRP rental payments in Sherman County were approximately $54 per acre in 2025 dollars, slightly below the statewide average of $61 per acre (USDA FSA, 2020-2031) (USDA FSA, 2022).

Economic Output and Employment

Agriculture is a foundational component of Sherman County's economy, generating substantial economic activity and supporting a significant share of local employment relative to statewide averages. In 2022, Sherman County generated approximately $60.3 million in agricultural sales, representing roughly one percent of Oregon's total agricultural revenue of $6.8 billion. Wheat dominates the County's agricultural economy, accounting for approximately $55.8 million, or 93 percent, of total agricultural sales (see Exhibit 6). The remaining agricultural sales are primarily associated with barley production and cattle and calf operations, which generated approximately $1.0 million and $2.6 million in sales, respectively.

[1] By the end of the USDA CRP fiscal year, September 30th

Exhibit 6. 2022 Agricultural Sales for Sherman County, in 2025 dollars

Agricultural Product	Sales	Percent of Agricultural Sales
Crops		
Wheat	$55,826,778	93%
Barley	$1,028,142	2%
Other crops and hay	$832,200	1%
Crop Total	$57,687,120	96%
Livestock		
Cattle and Calves	$2,600,076	4%
Sheep and goats	$23,117	<1%
Other livestock and poultry	$35,225	<1%
Livestock Total	$2,658,418	4%
Total Agricultural Sales	**$60,345,538**	**100%**

Source: (USDA, 2022)
Note: All figures are inflated into 2025 dollars using the CPI.

Sherman County's agricultural sector supports an estimated 304 jobs, including 79 wage-and-salary positions and 225 proprietorships, and generates approximately $11.9 million in labor income (IMPLAN, 2024). Of this total labor income, approximately $5.5 million is associated with wages and salaries and $6.4 million with proprietor income. Agriculture accounts for approximately 21 percent of all jobs and proprietorships within the County and contributes 17 percent of total County economic output, substantially higher than the statewide share attributable to agriculture.

Grain farming, primarily winter wheat production, is the County's largest agricultural employer, accounting for more than half of agricultural employment in Sherman County (see Exhibit 7), compared to less than one percent statewide. Livestock-related sectors, including beef cattle ranching and poultry and egg production, represent the County's second-largest agricultural employment category and account for approximately 13 percent of agricultural employment. Remaining agricultural employment is associated with support activities for agriculture, other crop farming, and related sectors.

Exhibit 7. Employment, Labor Income and Economic Output by Agricultural Sector in Sherman County, 2024

IMPLAN Sector	Description	Employment	Employment Income	Total Output
2	Grain farming	165	$5,303,000	$37,872,000
19	Support activities for agriculture and forestry	66	$4,537,000	$4,653,000
11	Beef cattle ranching and farming	39	$1,270,000	$3,840,000
10	All other crop farming	31	$431,000	$1,022,000
16	Commercial logging	1	$91,000	$121,000
13	Poultry and egg production	<1	$120,000	$867,000
14	Animal production, except cattle and poultry and eggs	<1	$97,000	$58,000
	Total	**304**	**11,849,000**	**$48,433,000**

Source: (IMPLAN, 2024)

Notes: All figures are inflated into 2025 dollars using the CPI. Employment jobs include all full-time, part time and temporary positions and proprietorships. IMPLAN Sector 2 - Grain farming includes wheat, corn, dry beans and dry peas. IMPLAN Sector 10 - All other crop farming includes hay farming (e.g. alfalfa, clover, grass), hops, mint and tea farming

According to IMPLAN estimates, grain farming also contributes the largest share of economic output among all sectors in Sherman County, generating approximately $37.9 million in annual economic output. Outside of agriculture, electric power generation – wind and miscellaneous chemical production manufacturing are the next-largest sectors, generating approximately $13.4 million and $12.0 million in economic output, respectively. Although smaller in scale, beef cattle ranching and farming and support activities for agriculture together contribute approximately $8.5 million in economic output. Overall, agricultural sectors generate approximately $48.4 million in economic output, representing approximately 17 percent of Sherman County's total economic output (see Exhibit 8). By comparison, agriculture accounts for less than two percent of statewide economic output in Oregon.

Exhibit 8. Top Ten IMPLAN Industry Sectors by Contribution to Economic Output in Sherman County, 2024

IMPLAN Industry Sector	Total Output in 2024
Grain farming	$37,870,000
Electric power generation - Wind	$13,410,000
Other miscellaneous chemical product manufacturing	$12,030,000
Fertilizer mixing	$10,230,000
Warehousing and storage	$10,070,000
Wholesale - Petroleum and petroleum products	$9,950,000
Retail - Gasoline stores	$8,580,000
Limited-service restaurants	$6,600,000
Management of companies and enterprises	$5,700,000
Transit and ground passenger transportation	$4,980,000

Source: (IMPLAN, 2024)
Note: All figures are inflated into 2025 dollars using the CPI. Excludes contribution from owner-occupied housing which is treated by IMPLAN as an industry because home-ownership generates wealth and is counted in GDP. Also excludes government payroll.

Winter Wheat Production

Winter wheat is the dominant agricultural crop produced in Sherman County, accounting for approximately 95 percent of harvested cropland and 99 percent of harvested wheat acreage in 2022. Winter wheat yields vary annually due to weather conditions, soil characteristics, and other production factors. As illustrated in Exhibit 9, winter wheat yields in Sherman County generally followed statewide production trends between 2014 and 2023, although average yields in the County were approximately 15 percent lower than statewide averages. This difference is likely influenced, in part, by the County's very limited irrigated acreage.[2]

Irrigation substantially increases winter wheat yields relative to dryland production systems. In 2022, approximately 8.6 percent of Oregon's winter wheat acreage was fully irrigated, producing average yields of 111 bushels per acre, approximately 80 percent higher than the statewide dryland yield average of 62 bushels per acre (USDA, 2025). By comparison, Sherman County harvested approximately 1,045 irrigated acres in 2022, of which fewer than 170 acres were planted in winter wheat. As a result, irrigated winter wheat represented less than 0.5 percent of total harvested winter wheat acreage within the County and likely had minimal influence on overall County yield averages.

Between 2015 and 2025, Sherman County winter wheat yields ranged from a low of 43 bushels per acre in 2015 to a high of 57 bushels per acre in 2025, with a normalized average yield of approximately 50 bushels per acre (see Exhibit 9). Severe drought

[2] Yields are a weighted average of irrigated, partially irrigated and unirrigated acres harvested. Sherman County's winter wheat acreage is almost entirely unirrigated. In the 98,185 acres harvested for winter wheat in 2022, less than 170 were irrigated.

conditions in 2021 reduced wheat yields across Oregon by approximately 30 percent; however, yield reductions in Sherman County were comparatively smaller, declining by approximately 15 percent during the same period (U.S. Wheat Associates, 2021).

Exhibit 9. Average Annual Yield for Winter Wheat, 2015 - 2025

Year	Sherman County		Oregon	
	Yield (bu/acre)	Year over Year Change	Yield (bu/acre)	Year over Year Change
2015	43		47	
2016	46	8%	50	6%
2017	50	9%	63	26%
2018	56	13%	67	6%
2019	55	-3%	68	1%
2020	51	-7%	64	-6%
2021	44	-15%	45	-30%
2022	54	23%	68	51%
2023	49	-9%	56	-18%
2024			70	25%
2025	57		71	1%
Normalized Average	**50**		**59**	

Source: (USDA, 2025)

Note: At the time this analysis was conducted, the USDA dataset did not include 2024 yield data for Sherman County.

Over the period from 2016 to 2025, Oregon winter wheat production averaged approximately 43.7 million bushels annually, reaching a high of 52.5 million bushels in 2025 and a low of 31.7 million bushels in 2021 during statewide drought conditions (U.S. Wheat Associates, 2021). Average winter wheat prices in Oregon ranged from a high of $8.87 per bushel in 2022 to a low of $4.44 per bushel in 2016, reflecting broader global market conditions and geopolitical disruptions affecting grain markets (Kane, 2025). Based on annual production and statewide average prices, the total annual value of Oregon winter wheat production fluctuated between approximately $157.6 million in 2016 and $431.3 million in 2022, with a normalized average annual production value of approximately $263.4 million over the 2016–2025 period (see Exhibit 10).

Exhibit 10. Oregon Winter Wheat Harvest and Value, 2016 to 2025

Year	Acres Harvested	Total Production (Bushels)	Average Price / Bushel	Total Value of Production	Value per Acre Harvested
2016	710,000	35,500,000	$4.44	$157,620,000	$222
2017	690,000	43,470,000	$5.02	$218,219,400	$316
2018	695,000	46,565,000	$5.76	$268,214,400	$386
2019	730,000	49,640,000	$5.73	$284,437,200	$390
2020	725,000	46,400,000	$5.90	$273,760,000	$378
2021	705,000	31,725,000	$8.71	$276,324,750	$392
2022	715,000	48,620,000	$8.87	$431,259,400	$603
2023	720,000	40,320,000	$6.02	$242,726,400	$337
2024	730,000	51,000,000	$5.75	$293,250,000	$402
2025	740,000	52,540,000	$6.05	$317,867,000	$430
Average	**716,000**	**44,578,000**	**$6.12**	**$272,705,915**	**$381**

Source: (USDA, 2025)

Note: Price is reported as a normalized average.

Within Sherman County, winter wheat production peaked at approximately 6.8 million bushels in 2025, generally tracking statewide production trends over time. Unlike statewide production, however, Sherman County did not experience its lowest production year during the 2021 drought. Instead, County production reached its lowest level in 2015 at approximately 4.8 million bushels. Elevated wheat prices in 2022, likely influenced by global supply disruptions associated with the war in Ukraine, may also have contributed to increased production following the 2021 drought period. Exhibit 11 presents annual winter wheat production and estimated production value within Sherman County. Estimated production values were calculated by applying statewide annual wheat prices to County-level production estimates and therefore may differ from wheat sales figures reported in USDA National Agricultural Statistics Service County Profile data presented earlier in Exhibit 6.

Exhibit 11. Winter Wheat Harvest, Production, and Value in Sherman County, 2015 to 2025

Year	Acres Harvested	Total Production (Bushels)	Total Value of Production
2015	112,900	4,795,000	$25,653,000
2016	113,500	5,190,000	$23,044,000
2017	114,000	5,690,000	$28,564,000
2018	110,000	6,200,000	$35,712,000
2019	114,500	6,280,000	$35,984,000
2020	115,300	5,903,000	$34,828,000
2021	117,300	5,123,000	$44,621,000
2022	115,500	6,214,000	$55,118,000
2023	116,300	5,640,000	$33,953,000
2024			
2025	119,000	6,819,000	$41,255,000
Average	**114,830**	**5,785,400**	**$34,898,818**

Source: (USDA, 2025)
Notes: At the time of analysis, the USDA dataset did not include 2024 yield data for Sherman County.

OREGON WHEAT COMMISSION

The Oregon Wheat Commission is a producer-funded program established to support the profitability and long-term competitiveness of Oregon wheat growers through research, marketing, education, and industry advocacy. Research funding is directed primarily toward work conducted by the USDA Agricultural Research Service Western Wheat Quality Laboratory and Oregon State University. Education and policy advocacy activities are supported through the Oregon Wheat Growers League. Together, these organizations provide research, outreach, and industry support services for Oregon wheat producers.

The Oregon Wheat Commission is funded through a $0.05 per bushel assessment collected at the point of first purchase. Based on Oregon's ten-year average winter wheat harvest of approximately 43.1 million bushels, this assessment would generate an estimated $2.2 million annually in Commission funding. Sherman County winter wheat production accounts for an estimated $284,600, or approximately 14 percent, of total statewide assessment revenue.

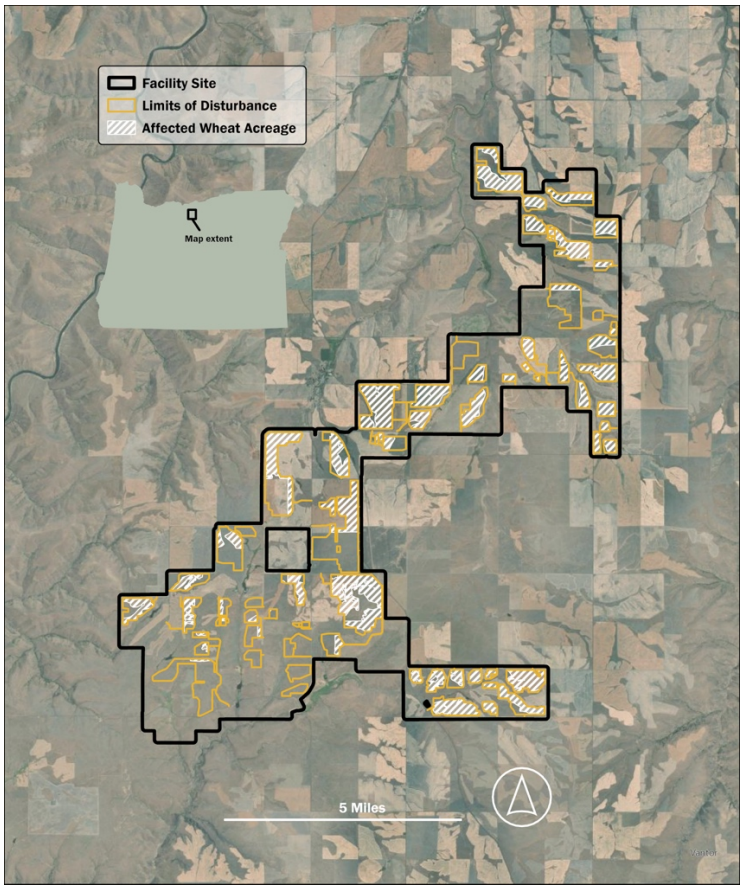
Facility Site Overview

Land cover in the Facility site is provided in Exhibit 12. Based on field surveys and land cover mapping, dryland winter wheat is the predominant crop produced within the Facility site. This finding was cross-checked using the USDA Cropland Data Layer (CDL), which uses satellite imagery to develop a georeferenced, crop-specific land cover dataset for the United States.

Consistent with the field survey results, the CDL indicates that dryland winter wheat was the primary crop grown within the Facility site in 2025.

Information provided by participating landowners further supports these findings. Of the approximately 24,000 acres within the Facility site boundary, an estimated 10,569 acres are currently in winter wheat production, with approximately 5,287 acres harvested annually as part of a two-year rotation system. Within the Facility's limits of disturbance (LOD), approximately 4,659 acres are in winter wheat production, representing an estimated 2,330 harvested acres annually. These acres account for approximately 44 percent of the winter wheat acreage within the Facility site.

Exhibit 12. Speedway Energy Facility Land Cover, 2025



Source: Brookfield Renewable U.S., Tetra Tech Habitat Survey

Not all acreage within the Facility LOD currently supports active winter wheat production. Disturbed lands also include CRP acreage, grazing lands, and other non-crop land cover types. As a result, the acreage of active wheat production potentially affected by the Facility is substantially smaller than the total Facility LOD.

Landowner Survey

The Facility site includes sixteen landowners. In support of the Application for Site Certificate (ASC) process, the Applicant conducted a landowner survey of the properties where the solar, wind, and battery energy storage system (BESS) components would be located. The survey was designed to collect information on existing agricultural activities and land management practices to inform the agricultural land use analysis. Consistent with USDA Cropland Data Layer (CDL) information, survey responses indicate that active agricultural use within the Facility site is primarily comprised of dryland winter wheat production, with cattle grazing occurring on portions of the site. A summary of the landowner survey results is provided in Exhibit D of the ASC.

Five landowners reported grazing livestock on lands located both within and outside the Facility lease areas. Survey responses indicate that grazing operations are expected to continue on portions of existing ranching operations that would remain available following Facility construction, although detailed information regarding stocking rates, pasture management, or relocation plans was not provided. Because cattle are mobile assets and grazing activities are anticipated to continue elsewhere within existing agricultural operations, the Facility is not expected to result in a reduction in countywide livestock production.[3] As a result, no material impacts to the local agricultural economy associated with livestock production are anticipated from the relocation of grazing activities within existing operations.

Eight landowners reported acreage enrolled in CRP. Lands enrolled in non-working lands CRP are not actively used for commercial agricultural production and are therefore not included in the analysis of agricultural production impacts. One landowner reported grazing cattle on CRP associated with the Grasslands Program (a working lands program) but reported that cattle would be moved to other unaffected lands. The Grassland CRP can allow for grazing activities on the land as long as the land cover is maintained by the rancher (USDA - Farm Service Agency, 2026). While CRP acreage can in some circumstances represent an agricultural land use, it does not contribute to current crop production and is not evaluated in this analysis.

Agricultural Operations Information

Operations within the Facility site include approximately 10,569 acres of wheat production, with roughly 5,285 acres harvested annually on average. Reported wheat yields over the past 5 to 10 years range from 30 to 45 bushels per acre, averaging 37.5 bushels per acre, which is

[3] One discrepancy was identified between the responses provided by a lessee and the corresponding landowner regarding potential livestock impacts. The lessee indicated that livestock operations could be affected by the Project but did not provide supporting information regarding the nature or magnitude of those impacts. In contrast, the landowner indicated that livestock operations would not be affected. Given the conflicting responses and the absence of evidence demonstrating a measurable or quantifiable impact, no impacts to livestock operations were identified or estimated as part of this analysis.

notably lower than the 10-year countywide normalized average of 51 bushels per acre (see Exhibit 9). While this discrepancy may be partially due to the inclusion of irrigated wheat in the countywide average, the Facility site yields reflect precipitation, soil quality and other site-specific factors and is confirmed by NRCS reported yields of averaging 36 bushels per acre in the Facility site.[4] Survey respondents indicated purchasing inputs through Northwest Grain Growers (formerly Mid-Columbia Producers) and Morrow County Grain Growers. Based on limited responses about input costs, respondents indicated chemical and fertilizer costs of $116 per acre and seed costs of $18 per acre which are used to adjust the agricultural impact modeling. Wheat is reported to be marketed and sold through Northwest Grain Growers.

The landowner survey confirms that operations within the Facility site include both operator and hired labor. However, details on the distribution between operator and hired labor were not consistently provided. Thus, labor estimates for the operations within the Facility site are estimated from published Oregon State University (OSU) crop budgets.

Agricultural Impacts

Based on landowner surveys and land cover data, agricultural production within the Facility site is limited to two-year rotation winter wheat production and cattle grazing. This section provides a conservative estimate of the wheat operations' contributions to the local agricultural economy, using spending associated with the current operator's wheat production. Based on the available survey information, only wheat production is expected to be affected by the Facility operations. While cattle grazing may be displaced from portions of the Facility site occupied by Project infrastructure, grazing activities are expected to continue elsewhere within the operation and are therefore not anticipated to result in a measurable reduction in livestock production.

Assumptions regarding wheat operations are based on survey data indicating that these operations produce an average of 37.5 bushels per acre of winter wheat. This production would directly contribute to a moderate amount of spending in the agricultural economy of Sherman County. To estimate the magnitude of the potential impact to the agricultural economy, the agricultural impact analysis models the participating operations' wheat production. This analysis relies upon publicly available data, published crop reports, regional trends, and local expert opinion. However, future agricultural production markets and conditions may differ from historical trends.

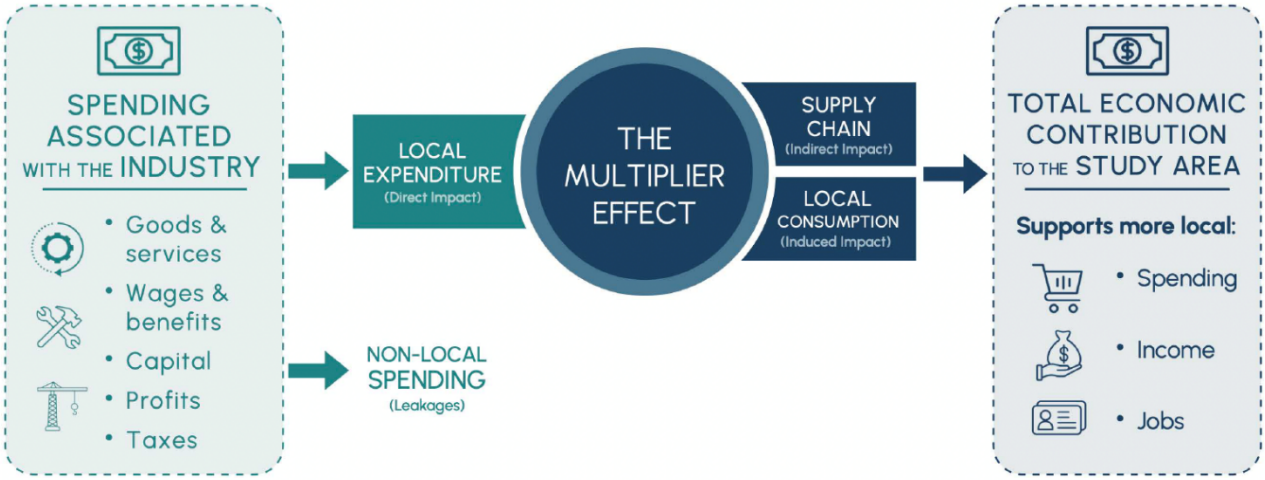
[4] Irrigated acreage accounts for only a small share of total Sherman County wheat production, so its effect is likely minimal.

Methodology (IMPLAN overview)

IMPLAN is a regional input-output (I/O) model widely used to assess the economic contributions of changes in production and spending. The IMPLAN model divides the economy into 528 sectors, and models the linkages between the various sectors, including accounting for government and household spending. Using national industry and county-level economic data from the U.S. Bureau of Economic Analysis, U.S. Census, and other government sources, IMPLAN models how spending in one sector of the economy is spent and re-spent in other sectors of the economy. The linkages are modeled through I/O tables that account for all dollar flows between different sectors of the economy.

The economic relationships modeled by IMPLAN allow the user to estimate the overall change in the economy that would result from money spent in a specific sector or activity (see Exhibit 13). The dollars spent are analyzed to determine the total economic contribution within the selected geography. The direct expenditures trigger successive rounds of spending that result in an overall increase in employment, labor income, and value added in the local economy. The summation of these contributions is referred to as the economic output.

Exhibit 13. Overview of Economic Impact Analysis Framework



Source: ECOnorthwest, 2025

IMPACT TYPES

Economic multipliers derived from the model are used to estimate total economic impacts. Total economic impacts consist of three components: direct, indirect, and induced impacts.

- **Direct impacts** are the output, jobs, and income associated with the immediate effects of a change in final demand.
- **Indirect impacts** are production changes in backward-linked industries caused by the changing input needs of directly affected industries. Suppliers to the directly involved industry will also purchase additional goods and services; spending leads to additional

rounds of indirect effects. Because they represent interactions among businesses, these indirect effects are often referred to as supply-chain effects.

- **Induced impacts** are the changes in regional household spending patterns caused by changes in household income. The direct and indirect increases in employment and income enhance the overall purchasing power in the economy, thereby inducing further spending by households. Employees in these industries, for example, will use their income to purchase groceries or take their children to the doctor. These induced effects are often referred to as consumption-driven effects.

IMPACT MEASURES

Impacts are assessed using the following measures that are reported by the IMPLAN model:

- **Jobs** are measured as the average number of employees engaged in full- or part-time work.
- **Labor income** is expressed as the sum of employee compensation and proprietor income. Employee compensation includes workers' wages and salaries, as well as other benefits such as health, disability, and life insurance; retirement payments; and non-cash compensation; expressed as total cost to the employer. Proprietor income (business income) represents the payments received by small-business owners or self-employed workers.
- **Output** is the total value of an industry's production and includes all components of the production function: labor income, taxes, profit, and intermediate inputs.

LIMITATIONS OF INPUT-OUTPUT MODELS

I/O models are static models used to measure an economy's inputs and outputs based on data that represents the relationships within an economy at a specific point in time. This analysis uses data from the 2024 model year, which represents the most recent year for which data was available at the time of this work. The model then estimates how specific changes in inputs to an economy result in changes throughout the economy. This approach—known as a "partial equilibrium analysis" works well when the modeled changes don't radically reshape the relationships within an economy or affect the fundamental characteristics of labor markets, prices, or property values. Given what we know of the area economy, the scale of the project, and other considerations, the IMPLAN model is an appropriate tool to perform this analysis.

Agricultural Impacts of Existing Winter Wheat Production within the Facility Site

The operations within the Facility site produce an estimated annual value of $1.2 million. Production estimates are generated based on a combination of publicly available data and the

landowner surveys and are presented in the following sections. The agricultural production value of the wheat operations is used to estimate the economic contributions of these operations to Sherman County. These estimates are used to model the indirect effects to the local agricultural economy if the wheat operations cease production.

Crop Production Value

The value of crop production in the Facility site is dependent on wheat yields, prices, and harvested acreage. The landowner survey indicates that the wheat operations account for roughly 10,569 acres of wheat production, with 5,285 acres harvested annually on average, which is confirmed by data from USDA's Cropland Data Layer.

While estimates of the production value for wheat were not consistently provided by the landowners, wheat prices are available from USDA-NASS. The ten-year normalized average wheat price in Oregon is $6.12 (see Exhibit 10), which is the assumed wheat price of the wheat operations. Wheat yields for these operations are reported by the landowners to average 37.5 bushels per acre over the past 5 to 10 years. The reported yield is lower than the countywide 10-year normalized average of 51 bushels per acre (see Exhibit 9). The yields observed within the Facility site likely reflect local precipitation patterns, soil conditions, topography, and other site-specific production factors. Reported yields are generally consistent with NRCS soil productivity estimates for dryland winter wheat within the Facility site, which average 36 bushels per acre (USDA NRCS Web Soil Survey, 2026). Given the NRCS soil productivity estimates for the land in the Facility site are lower than the average county yields, this analysis used the average landowner reported yield (37.5 bu/acre), to calculate the annual production. Using a price of $6.12 per bushel, annual winter wheat sales for these farmers is estimated at $1.2 million within the site boundary. Estimated annual winter wheat sales within the Facility site represent approximately 3.4 percent of Sherman County's average annual winter wheat production value ($34.9 million annually), indicating that the Facility site supports a meaningful but relatively small share of countywide wheat production (USDA, 2025).

Economic Output and Employment

Total sales by agricultural commodity group are summarized in preceding sections and in Exhibit 6. These data from the 2022 Agricultural Census identify agricultural sales in Sherman County for that year, representing the most recent agricultural census data (USDA NASS, 2024).[5] In addition, employment, labor income, and economic output are summarized by agricultural sector in Exhibit 7. The second set of data are from the 2024 IMPLAN model for Sherman County and information is summarized by IMPLAN economic sector. These two

[5] This represents the most recent NASS census data available. However, 2025 NASS survey data is available for Sherman County and Oregon including wheat prices, which are utilized in this analysis.

sources of information each provide a comprehensive picture of the agricultural economy in Sherman County and together are used as a baseline for the following assessment.

As shown in Exhibit 6, the 2022 Agricultural Census estimated total sales of $60.3 million in Sherman County, with crop sales accounting for 96 percent of the total value. Livestock made up the remaining 4 percent of sales. Agricultural production within the Facility site is expected to contribute a moderate amount of local spending in the agricultural economy based on the operations' size and production value. The participating landowners are assumed to purchase some goods and services (e.g., equipment, fertilizer, fuel, and seed) from businesses within Sherman County.

CROP PRODUCTION ECONOMIC OUTPUT AND EMPLOYMENT

The economic impacts associated with the estimated $1.2 million in annual winter wheat production value within the site boundary are modeled using IMPLAN. This output value is based on an average market value $6.12 per bushel of wheat as discussed in the preceding sections. Exhibit 14 presents the local economic activity supported by the crop within the Facility site based on an estimated output of $1.2 million and employment information provided in the landowner survey and supplemented with OSU crop budgets detailing employment requirements for wheat production. These impacts are annual, and result in small annual amounts of economic activity in the following ways:

- The direct impact represents the gross value of crop and the associated employment. The direct employment number shown in Exhibit 14 is based on labor estimates from OSU. To model the labor hours and income, full-time jobs were scaled down to the size of the acres within the Facility site based on OSU enterprise budgets for winter wheat (Powell & Seavert, 2021). Based on these calculations, the modeled job count is 1 full job with $44,000 in labor income split between any operator and hired labor.
- The indirect impact represents economic activity supported by the agricultural production within the Facility site. Because the wheat operations purchase some of their inputs within Sherman County, it supports additional economic activity through spending on items such as fuel, fertilizer, seed, and equipment. Crop production within the siting corridor supports 4.1 indirect jobs associated with $263,000 in labor income. The estimated indirect economic output is $527,000 annually.
- Induced impacts are generated by the spending of households associated either directly or indirectly with ongoing crop production within the Facility site boundary. The direct spending from wheat crop production supports $66,000 in induced output, less than one job and $18,000 in labor income.

Exhibit 14. Economic Impacts of Existing Winter Wheat Production within the Facility Site

Impact	Employment	Labor Income	Output
Direct	1.0	$44,000	$1,212,000
Indirect	4.1	$263,000	$527,000
Induced	0.3	$18,000	$66,000
Total	**5.5**	**$325,000**	**$1,805,000**

Source: (IMPLAN, 2026)

Note: Direct employment includes both operator and hired labor. Since operation specific labor distribution between operator and hired labor and across wheat production activities were unavailable, all direct employment was modeled based on published crop budgets as hired full-time employment.

Agricultural Impacts of Facility Operations

Within the Facility site, approximately 4,659 acres of winter wheat production are located within the Facility's LOD (as presented in Exhibit 12) and are therefore expected to be affected by Facility operations. Under the two-year winter wheat rotation, these acres represent approximately 2,330 harvested acres annually. Based on the landowner survey responses, this analysis assumes that any livestock currently within the Facility site would be relocated to other parcels within the existing operations or elsewhere in Sherman County. Under this assumption, no reduction in livestock inventory or sales is anticipated as a result of the Facility. Thus, this analysis assumes the impacts of Facility operations are limited to crop production.

While the economic activity represented in Exhibit 15 results from winter wheat production within the Facility site, the indirect impacts most closely reflect annual economic activity in the agricultural sector of Sherman County supported by operations' wheat production, which would be lost to the agricultural economy of Sherman County when the Facility is built.

Assuming farmers cannot secure alternate land for wheat production, they would experience a direct loss of profit from the displaced operations and a reduction in employment of 0.5 jobs for wheat operation. The participating landowners, in turn, would replace income received from crop sales with lease payments from Brookfield, which are assumed to be equal to or greater than previous income. The economic activity in Sherman County supported by the wheat operations that may be affected when the Facility is built is approximately 2 jobs (1.8 jobs modelled), an estimated $116,000 in labor income, and $232,000 in economic output (the indirect impacts presented in Exhibit 15). While the distribution of economic impacts between the landowners would differ, this analysis estimates the economic impacts to Sherman County's overall agricultural economy as opposed to costs borne by individual operators.

Exhibit 15. Economic Contributions of Wheat Acres Impacted by Facility Operations

Impact	Employment	Labor Income	Output
Direct	0.5	$19,000	$534,000
Indirect	**1.8**	**$116,000**	**$232,000**
Induced	0.2	$8,000	$29,000
Total	**2.5**	**$143,000**	**$795,000**

Source: (IMPLAN, 2026)

Note: Direct employment includes both operator and hired labor. Since operation specific labor distribution between operator and hired labor and across wheat production activities were unavailable, all direct employment was modeled based on published crop budgets as hired full-time employment.

The IMPLAN agricultural sectors most impacted by the indirect impacts related to wheat production are Sector 2 - Grain farming and Sector 19 – Support activities for agriculture and forestry, which were the first and second largest agricultural employers in Sherman County in 2024 (see Exhibit 7). Due to the size of the agricultural production affected by the Facility, 1.8 indirect jobs positions are anticipated to be lost due to the Facility.

The remaining indirect employment is distributed across multiple IMPLAN sectors including support activities for agriculture and forestry. These jobs supported elsewhere in the local economy do not translate into individual positions. A reduction in demand could, for example, result in a reduction in hours worked or reduced overtime, without resulting in job loss. The jobs arising from the induced impacts consists of employment distributed over a range of different economic sectors.

Commodity Organizations

A reduction in agricultural production in the Facility site may also have a minor effect on commodity organizations such as the Oregon Wheat Commission that collects revenue based on commodity production within the State. The annual reduction in wheat production due to the Facility is estimated at roughly 87,356 bushels and would reduce Oregon Wheat Commission fees by an estimated $4,370 annually over the operational life of the Facility, or 0.2 percent of estimated statewide fees.

Changes in agricultural production can have downstream market effects that are difficult to quantify; however, given the relatively small amount of production affected by the Facility, any broader market impacts are expected to be negligible.

Works Cited

IMPLAN. (2024). Industry Detail . Wasco .

IMPLAN. (2025). Retrieved from www.implan.com

IMPLAN. (2026). Retrieved from www.implan.com

Kane, M. (2025, December 04). *Growers find little good news in Oregon wheat market*. Retrieved from Hermiston Herald: https://hermistonherald.com/2025/12/04/growers-find-little-good-news-in-oregon-wheat-market/

Oregon DLCD. (2024). *OREGON FARM & FOREST LAND USE REPORT 2022-23.* Retrieved from Oregon Department of Land Conservation and Development: https://www.oregon.gov/lcd/FF/Documents/Farm_Forest_Report_2022_2023.pdf

Powell, J., & Seavert, C. (2021, April). Wheat (Winter) Following Fallow, Direct Seed, 10 to 14-inch Precipitation Zone, North Central Region. Oregon State University Extension Service.

Sherman County Assessor's Office. (Accessed 2025). Retrieved from https://www.co.sherman.or.us/departments/assessors-office/

U.S. Census Bureau TIGER/Line Shapefiles. (Accessed 2025). *TIGER/Line Shapefiles*. Retrieved from https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.html

U.S. Wheat Associates. (2021). *Wheat Letter Blog*. Retrieved from U.S. Wheat Associates: https://www.uswheat.org/wheatletter/2021-soft-white-wheat-crop-faced-challenging-growing-conditions/

USDA - Farm Service Agency. (2026, May). *Grassland Conservation Reserve Program (CRP).* Retrieved from https://www.usda.gov/sites/default/files/guidance-documents/FSA.Grassland-CRP-208-05-2026.pdf

USDA. (2017). *County Profile.* Retrieved from National Agricultural Statistical Service: https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/County_Profiles/Oregon/cp41055.pdf

USDA. (2022). *County Profile.* Retrieved from National Agricultural Statistics Service: https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Oregon/cp41055.pdf

USDA. (2022). *Oregon Ag Census*. Retrieved from National Agricultural Statistics Service: https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Oregon/cp99041.pdf

USDA. (2025). *Quick Stats*. Retrieved from USDA National Agricultural Statistics Service: https://quickstats.nass.usda.gov/

USDA FSA. (2020-2031). *Conservation Reserve Program Statistics, CRP Contract Expirations by County, 2020-2031.* Retrieved from Farm Service Agency U.S. Department of Agriculture: https://www.fsa.usda.gov/resources/programs/conservation-reserve-program/statistics

USDA FSA. (2022). *Conservation Reserve Program (CRP) Statistics, CRP Enrollment and Rental Payments by County, 1986-2022.* Retrieved from Farm Service Agency U.S. Department of Agriculture: https://www.fsa.usda.gov/resources/programs/conservation-reserve-program/statistics

USDA NASS. (2024). *2022 Wasco County Profile.* Retrieved from National Agricultural Statistics Service: https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Oregon/cp41065.pdf

USDA NASS. (2024). *CDL*. Retrieved from NASS: https://www.nass.usda.gov/Research_and_Science/Cropland/SARS1a.php

USDA NRCS Web Soil Survey. (2026). *Yields of Non-Irrigated Crops, Winter Wheat, Wherman County OR*. Retrieved from National Cooperative Soil Survey: https://websoilsurvey.nrcs.usda.gov/app/

Attachment D-2.
Economic Impact Analysis

ECOnorthwest

DATE:	July 1, 2026
TO:	Vincent Esposito, Brookfield Renewable
FROM:	Terry Wirkkala, ECOnorthwest
SUBJECT:	Speedway Energy Facility Construction and Operation Economic Impacts

Executive Summary

BGTF Speedway Project LLC, a subsidiary of Brookfield Renewable N.A. (Brookfield), proposes to construct the Speedway Energy Facility (Facility) near Grass Valley in Sherman County, Oregon. The Facility will have a maximum injection capacity of 1,400 megawatts (MW) of alternating current (AC) electricity. The Facility also includes a battery energy storage system (BESS) with up to 1,400 MW of storage capacity, with a 4-hour duration, configured as six separate BESS areas within the site boundary.

This executive summary presents the key findings from an economic impact analysis of Facility construction and operation. The analysis evaluates how Facility-related spending would support employment, labor income, and economic output within the local area economy, defined as Sherman, Wasco, Hood River, and Klickitat (WA) counties. Results are based on preliminary Facility specifications and are commensurate with an early planning-stage level of analysis.

Analytical Approach

Economic impacts were estimated using IMPLAN, a widely used regional input-output modeling framework. The analysis evaluates two phases of economic activity:

- Construction impacts associated with Facility development over an anticipated 30-month construction period.
- Operational impacts associated with ongoing Facility operations over an anticipated 30-year operating life.

The analysis estimates direct, indirect, and induced economic effects. Direct effects reflect on-site employment and Facility-related expenditures. Indirect effects capture supply-chain activity generated by purchases of goods and services. Induced effects reflect household spending supported by labor income earned through direct and indirect employment.

The results presented reflect economic contributions rather than net economic impacts. The analysis does not evaluate alternative uses of labor, capital, or land in the absence of the Facility and therefore represents the gross contribution of Facility-related activity to the local area economy.

Construction Phase Economic Impacts

Facility construction is anticipated to involve approximately $2.97 billion in total construction costs, including labor and financing costs. Construction is expected to begin in 2027 and occur over approximately 30 months, with overlapping development schedules for solar, wind, and BESS components.

At peak construction, the Facility is estimated to support approximately 1,049 construction workers annually, including both local and non-local workers. Based on estimated local purchasing patterns and labor availability, approximately 401 of these jobs are expected to be filled by workers residing within the local area.

Construction-related spending within the local area economy is estimated to support substantial secondary economic activity. Over the construction period, local expenditures are estimated to support:

- Approximately 1,899 total annual jobs, including direct, indirect, and induced employment.
- Approximately $369.41 million in labor income over the full construction period.
- Approximately $3.43 billion in total economic output, of which roughly $1.46 billion is expected to occur within the local area economy.

The estimated output multiplier for construction is 1.15, indicating that for every dollar of direct construction spending, an additional $0.15 in economic output is supported within the local area economy. These impacts represent one-time economic activity associated with Facility development.

Operations Phase Economic Contributions

Following construction, Brookfield anticipates operating the Facility for approximately 30 years beginning in 2030. During operations, the Facility would support economic activity through direct employment, ongoing operations and maintenance expenditures, and lease payments to participating landowners.

Impact	Employment	Labor Income	Output
Direct	20	$2,230,000	$36,930,000
Indirect	20	$1,330,000	$4,420,000
Induced	60	$3,310,000	$11,070,000
Total	**100**	**$6,870,000**	**$52,420,000**

Facility operations are expected to directly employ approximately 20 full-time workers residing within the local area, with aggregate wages and benefits estimated at approximately $2.2 million annually. Total annual operations-related expenditures are estimated at $36.9

million, including maintenance, administration, insurance, replacement parts, and other operating costs.

Annual operations-related spending is estimated to support:

- Approximately 100 total jobs, including direct, indirect, and induced employment.
- Approximately $6.9 million in total labor income annually.
- Approximately $15.5 million in secondary economic output within the local area economy.

The estimated output multiplier for operations is 1.42, reflecting the ongoing circulation of operations-related spending within the local area economy. While operations-related impacts are smaller in magnitude than construction impacts, they represent stable, recurring economic contributions over the long term.

Regional Economic Context

The local area economy currently supports approximately 35,608 jobs and generates approximately $9.2 billion in annual economic output. When viewed in this context, annual local construction-related impacts represent approximately 3 to 6 percent of local area employment and output during the construction period, reflecting the large scale of the Facility and the concentration of spending over a relatively short timeframe.

Operations-related impacts represent a smaller share of the local economy, approximately 0.3 percent of employment and 0.4 percent of output, but provide sustained economic contributions over the Facility's operating life. These ongoing impacts contribute to long-term economic stability through continued employment, business activity, and income generation.

Overall, the Facility is expected to generate substantial short-term economic activity during construction and provide sustained, long-term economic contributions during operations, supporting employment, labor income, and business activity within the broader local and regional economy.

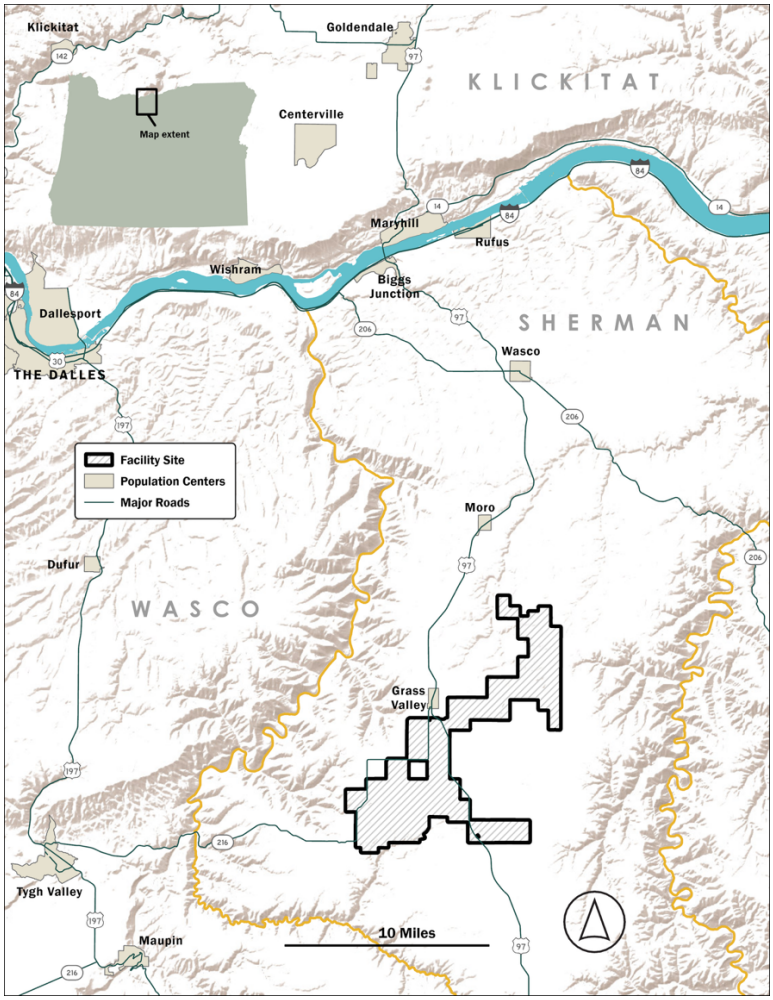
Transient Lodging Tax Contributions

In addition to the economic impacts, Facility construction is anticipated to generate transient lodging tax (TLT) revenues associated with the temporary non-local construction workforce. Depending on worker lodging preferences and occupancy patterns, TLT revenues are estimated to range from approximately $0.5 million to $5.1 million during the approximately 30-month construction period. These revenues would be distributed among the State of Oregon and local taxing jurisdiction.

Introduction

BGTF Speedway Project LLC, a subsidiary of Brookfield Renewable N.A. (Brookfield) is proposing to construct the Speedway Energy Facility (Facility) near Grass Valley in Sherman County, Oregon. The Facility includes 1.4 GW of combined solar and wind generating capacity, a 1.4 GW battery energy storage system (BESS) and supporting infrastructure. The Facility's site boundary encompasses approximately 24,000 acres of privately owned land zoned for exclusive farm use land (Exhibit 1). This memo details the potential economic impacts of Facility construction and operation in terms of jobs, income and output. This analysis is based on preliminary Facility specifications and is presented at a level of detail appropriate for the Facility's early planning stage.

Exhibit 1. Speedway Energy Facility Site



Source: (Sherman County Assessor's Office, Accessed 2025) (U.S. Census Bureau TIGER/Line Shapefiles, Accessed 2025)

Economic Impact Analysis

The economic impact analysis estimates the economic impacts that Facility spending would have on the local area[1] economy, as measured through changes in employment, income, and economic output (a measure of economic productivity). This analysis estimates impacts across two dimensions: 1) impacts arising from spending during the initial construction phase; 2) impacts arising from spending during the operations phase, a period of 30 years following construction. These impacts are assessed using the IMPLAN model. Construction and operation of the Facility would support economic activity in Sherman, Hood River, Wasco, and Klickitat (WA) counties by employing people to work on the Facility and purchasing materials and services to build and maintain the Facility. Since this analysis does not consider a complete comparison of the economy with and without the Facility, the impacts should be considered economic contributions that focus on the Facility's gross contribution to the economy without fully accounting for how resources might have been used if the Facility were not built.

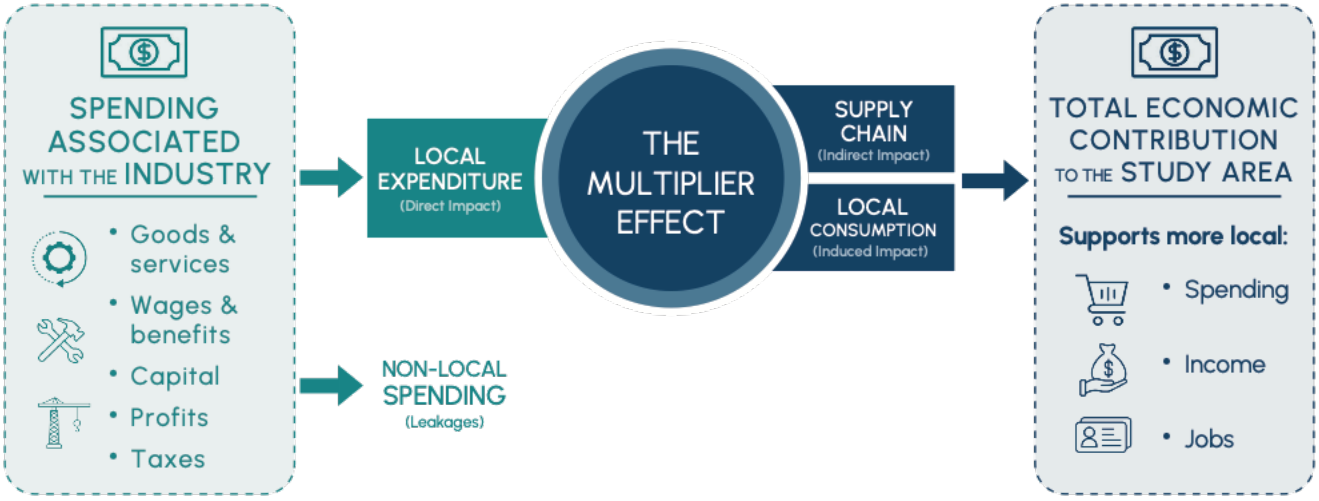
Economic Impact Analysis Overview

IMPLAN is a regional input-output model widely used to assess the economic impacts of a business' or an organization's operations, capital developments and many other types of projects or policies. The IMPLAN model divides the economy into 528 sectors, and models the linkages between the various sectors, including accounting for government and household spending. Using national industry and county-level economic data from the U.S. Bureau of Economic Analysis, U.S. Census, and other government sources, IMPLAN models how spending in one sector of the economy is spent and re-spent in other sectors of the economy. The linkages are modeled through input-output tables that account for all dollar flows between different sectors of the economy.

The economic relationships modeled by IMPLAN allow the user to estimate the overall change in the economy that would result from the specified economic activity (see Exhibit 2). The dollars spent on operations and construction are analyzed to determine the total economic impact within the selected geography. The direct investments from a Facility, policy, or organization's operations support successive rounds of spending that can be traced to employment, labor income, and output in the local area economy. The summation of these impacts is referred to as the economic output.

[1] The local area is defined as Sherman, Hood River, Wasco, and Klickitat (WA) Counties based on an approximate one-hour drive time to the Facility site. Please see 'Speedway Renewable Energy Facility: Workforce and Housing Availability' Memo for a full discussion on the methodology for defining the local area.

Exhibit 2. Overview of Economic Impacts Analysis Framework



Source: ECOnorthwest, 2026

Impact Types

Economic multipliers derived from the model are used to estimate total economic impacts. Total economic impacts consist of three components: direct, indirect, and induced impacts.

- **Direct impacts** consist of expenditures made specifically for the proposed Facility, such as construction labor and materials. These direct impacts generate economic activity elsewhere in the local area economy through the multiplier effect, as initial changes in demand "ripple" through the local area economy and generate indirect and induced impacts.
- **Indirect impacts** are generated by expenditures on goods and services by suppliers who provide goods and services to the construction Facility. Indirect effects are often referred to as "supply-chain" impacts because they involve interactions among businesses.
- **Induced impacts** are generated by the spending of households associated either directly or indirectly with the proposed Facility. Workers employed during construction, for example, will use their income to purchase groceries and other household goods and services. Workers at businesses that supply the Facility during construction or operation will do the same. Induced effects are also referred to as "consumption-driven" impacts.

Impact Measures

Economic impacts are assessed using the following measures that are reported by the IMPLAN model:

- **Jobs** are measured as the number of employees engaged in full- or part-time work.
- **Labor income** is expressed as the sum of employee compensation and proprietor income.
    - Employee compensation (wages) includes workers' wages and salaries, as well as other benefits such as health, disability, and life insurance; retirement payments; and non-cash compensation; expressed as total cost to the employer.
    - Proprietor income (business income) represents the payments received by small-business owners or self-employed workers.
- **Output** is the total value of an industry's production and includes all components of the production function: labor income, taxes, profit, and intermediate inputs.

Limitations of Input-Output Models

I/O models are static models used to measure an economy's inputs and outputs based on data that represents the relationships within an economy at a specific point in time. This analysis will use data from the 2024 model year, which is the most recent year for which data is available. The model then estimates how specific changes in inputs to an economy result in changes throughout the economy. This approach—known as a "partial equilibrium analysis" works well when the modeled changes don't radically reshape the relationships within an economy or affect the fundamental characteristics of labor markets, prices, or property values. Given what we know of the area economy, the scale of the project, and other considerations, the IMPLAN model is an appropriate tool to perform this analysis.

Construction Economic Impacts

Facility Construction Modeling and Input Assumptions

Facility construction is expected to take place over a 30-month period and is anticipated to start in 2027. Brookfield estimates that construction costs would be $2.97 billion, including labor and financing costs. Where detailed construction and cost estimates were not available due to the preliminary planning stage of the project, ECOnorthwest utilized publicly available data and IMPLAN to estimate construction costs by item and the labor occupations required for construction.

Peak construction workforce of the Facility is estimated at 1,049 workers (with an estimated 695 employees from outside of the local area). Employment estimates are inclusive of installation labor, specialized construction operators, engineers, inspectors, construction management, and administrative services.

To estimate labor income during construction, ECOnorthwest relied on labor percent of total construction cost estimates for solar and wind facilities from the National Laboratory of the Rockies' (NLR) JEDI model. NLR estimates 10 percent of construction costs for solar are attributable to labor and 4.5 percent of construction costs for wind are attributable to labor (National Laboratory of the Rockies, 2025). Since the construction cost estimates are inclusive of both solar and wind components, ECOnorthwest weighted labor costs based on the nameplate capacity of each component. Based on this approach, the estimated labor costs associated with construction are $226 million over the 30-month period.

The economic impacts of Facility construction are based solely on construction-related purchases within the local area economy. For this analysis, the local area economy is defined as Sherman, Wasco, Hood River, and Klickitat counties to account for uncertainty regarding the location of local purchases at this early stage of the Project and to remain consistent with the anticipated local workforce (please see 'Speedway Renewable Energy Facility: Workforce and Housing Availability' memo for a full discussion on the methodology for defining the local area).

Brookfield provided itemized construction costs and information on local purchases where available. Estimates of local spending not provided by Brookfield are assumed within the IMPLAN model utilizing the Regional Purchase Coefficients (RPC), which estimate the percent of local demand met by local supply within the selected economy. These local expenditures are what generate the secondary (indirect and induced effects).

Direct impacts related to construction materials are representative of the estimated total construction cost, and do not represent the spending that will occur within the study area economy. This allows the calculation of the economic output multiplier, which indicates how the direct dollars will ripple through the study area economy.

This analysis is based on preliminary specifications for the Facility and is analyzed at a level commensurate with the early planning level stage of the Facility. Utilizing these assumptions within the IMPLAN model gives a broad estimate of local economic dynamics and produce reasonable estimates of the Facility's economic impacts based on the available information. However, due to the reliance of the model on preliminary Facility specifications, the estimated results are subject to change based on final Facility specification.

Economic Impacts of Facility Construction in the Local Area

The estimated economic impacts of local construction-related expenditures over the 30-month construction period are summarized in Exhibit 3. These estimates are one-time economic activities that would occur over the anticipated construction period. Job estimates are presented at peak employment for the period of construction.

Construction of the Facility would directly support an estimated peak of 1,049 jobs, 401 of which will be filled locally. Local construction-related expenditures and employment would

support an estimated 570 indirect jobs and 280 induced jobs at peak over the course of construction. The total employment impact from the construction of the Facility is estimated to be 1,899 jobs at peak. The total labor income associated with all construction-related spending is $369.4 million over the entire construction period. Labor income associated with secondary employment (indirect and induced) is estimated to total $143.8 million over the duration of construction.

The total output supported by construction-related Facility spending is estimated to be $2.97 billion, $1 billion of which is expected to be spent within the local area. The economic output multiplier is a commonly used metric to understand the magnitude of the economic effect of a Facility. The multiplier is calculated by dividing the total output by the direct output. The output multiplier of 1.15, meaning that for every dollar of direct output, an additional $0.15 of output will be supported in the local area economy.

Exhibit 3. Total Economic Impacts of Facility Construction at Peak Workforce

Impact Measure	Impact Type	Total
Peak Jobs	Direct	1,049
	Indirect	570
	Induced	280
	Total	**1,899**
Labor Income	Direct	$225,600,000
	Indirect	$107,340,000
	Induced	$36,470,000
	Total	**$369,410,000**
Output	Direct	$2,971,710,000
	Indirect	$338,050,000
	Induced	$121,180,000
	Total	**$3,430,940,000**

Source: (IMPLAN, 2024), ECOnorthwest Analysis

Notes: Economic contributions are shown for peak construction workforce over the entire period of construction. All monetary values are presented in 2025 dollars. Figures may not sum due to rounding.

PER DIEM SPENDING DURING FACILITY CONSTRUCTION

In addition to the construction related spending in the local area economy, there are potential economic impacts of per diem spending of non-local construction workers. Brookfield did not provide ECOnorthwest with information regarding per diem payments to non-local construction workers. ECOnorthwest estimates total per diem spending over the construction phase using per diem rates for lodging and meals from the U.S. General Services Administration (GSA). The daily per diem rate for lodging in Oregon is $110 and the daily per diem rate for meals is $68 which means daily per diem is $178 for all 648 non-local construction workers (U.S. General Services Administration, 2025) (U.S. Bureau of Labor

Statistics, 2025). Total per diem over the entire construction period is estimated to be $105.3 million or $35.1 million annually on average.

Operation Economic Impacts

Facility Operations Modeling and Input Assumptions

Brookfield anticipates operating the Facility for 30 years beginning in 2030. The Facility would support economic activity through direct operation-related employment, operation expenditures, and land lease payments to landowners. Brookfield provided estimated operating cost inputs, employment and wages associated with operations. Brookfield anticipates that the Facility will employ 20 full-time employees who live within the area and pay aggregate wages of $1.7 million. ECOnorthwest estimates the benefits paid by the employer to the employee based on the Employer Cost of Employee Compensation (ECEC), published by the Bureau of Labor Statistics (U.S. Bureau of Labor Statistics, 2025). The annual operations cost is estimated to be $36.9 million in expenditures; $2.2 million in wages and benefits to employees; and $13.5 million in lease payments. The lease payments are modeled as an increase in household spending on goods and services and produce only induced impacts. Operations costs include replacement parts for maintenance, equipment for maintenance, administration, insurance, and miscellaneous supplies. Brookfield indicated that maintenance and other services would be partially sourced from the local area. ECOnorthwest estimates indirect and induced economic impacts for only the local expenditures reported by Brookfield, and therefore only presents secondary results for the local area economy. As with the construction model, the direct impacts represent the total operations-related spending both inside and outside the local area economy.

In the operations model, ECOnorthwest relies on preliminary property taxes estimated provided by Brookfield.[2] However, tax estimates do not produce secondary impacts in economies.

Economic Impacts of Facility Operations

The estimated average annual economic impacts of the operations phase of the Facility are summarized for the local area in Exhibit 4. These impacts would occur annually over the Facility's anticipated 30-year life. This analysis assumes consistent annual operation costs over the life of the Facility based on estimates provided by Brookfield; however actual operations costs may vary from year to year over the life of the Facility.

Operation of the Facility would directly employ an estimated 20 full-time workers. Local operations-related expenditures and lease payments to landowners would support an

[2] Please see the 'Fiscal Impact Analysis' for more information on Facility property taxes.

estimated 20 indirect jobs and 60 induced jobs. The total employment impact from the annual operation of the Facility is estimated to be approximately 100 jobs. Direct labor income totals $2.2 million for operations workers and labor income associated with secondary employment (indirect and induced) totals $4.6 million annually.

The annual direct economic output of the Facility is estimated at $36.9 million, however only a portion of these dollars ripple through the local area economy. The secondary (indirect and induced) annual economic output supported by Facility operations is $15.5 million. The economic output multiplier for operations in the model is 1.42, indicating that for every dollar spent on Facility operations, $0.42 is supported in the broader local area economy.

Exhibit 4. Annual Economic Impacts of Facility Operations in Local Area

Impact	Employment	Labor Income	Output
Direct	20	$2,230,000	$36,930,000
Indirect	20	$1,330,000	$4,420,000
Induced	60	$3,310,000	$11,070,000
Total	**100**	**$6,870,000**	**$52,420,000**

Source: IMPLAN, 2024; Brookfield, 2025; ECOnorthwest Analysis
Notes: All values in 2025 dollars Figures may not sum due to rounding.

Regional Context of Economic Impacts

The economic impact analysis assesses the economic impacts of construction and operation of the Facility within the local area economy. Using an input-output modeling framework, the analysis illustrates how Facility-related spending supports employment, labor income, and economic output through both direct expenditures and secondary effects as those expenditures circulate through the local area economy.

During the construction phase, Facility-related spending represents a substantial, though temporary, source of economic activity relative to the size of the local area economy. Construction-related expenditures support employment not only on-site, but also across supplier industries and consumer-facing sectors through indirect and induced effects.

When viewed in the context of the local area economy's total employment (35,608 jobs) and output ($9.2 billion), annual construction-phase local impacts represent approximately 3 percent of local area employment and 6 percent of local area economic output, reflect the large scale of the Facility and the concentration of economic activity over the course of construction.

During operations, the Facility provides a smaller but sustained contribution to the regional economy over its anticipated 30-year operating life. Ongoing local employment, operations and maintenance spending, and lease payments to landowners support continued economic activity and income generation equating to 0.4 percent of local area output and 0.3 percent of

local area jobs. While operations-related impacts represent a modest share of total regional employment and output, they provide long-term economic stability and recurring economic benefits that persist well beyond the construction period.

Overall, the Facility is expected to contribute meaningfully to local area economic activity during construction and to provide sustained, long-term economic contributions during operations, reinforcing the Facility's role as a significant source of employment, income, and business activity within the broader economy.

Transit Lodging Tax Impacts

In addition to the regional economic impacts associated with Facility construction and operations, the Project has the potential to generate fiscal revenues for local governments. During construction, these revenues may include transient lodging tax (TLT) receipts generated by non-local workers utilizing local lodging establishments. Depending on the final tax structure, the Project may also generate property tax or other recurring local tax revenues during operations.

This section estimates the potential TLT revenues that could be generated in Hood River, Klickitat, Sherman, and Wasco counties during the construction period for illustrative purposes. Property tax revenues are not estimated because the Project's final taxation approach has not yet been determined, resulting in uncertainty regarding the applicable tax mechanism and the jurisdictions that would ultimately receive those revenues.

Transient Lodging Tax

A TLT is a tax on the amount charged for occupancy of transient lodging. The State of Oregon has a statewide TLT of 1.5 percent of the amount charged for occupancy and allows for localities to issue their own TLTs (Oregon Department of Revenue, 2025). However, Sherman County does not have a local TLT in place. Workforce housing is anticipated to occur in Hood River, Klickitat, Wasco, and Sherman Counties. Neighboring Hood River, Klickitat, and Wasco counties have municipalities that charge TLTs. Exhibit 5 presents the TLT rates and five-year revenue averages for the Cascade Locks, Goldendale, Hood River, Maupin and The Dalles. Cascade Locks has a 7 percent rate and generates an average of $240,000 annually; Hood River has an 8 percent rate and generates an average of $1.9 million annually; Goldendale has a 2 percent rate that generates an average of $80,000 annually; Maupin has a 6 percent rate that generates an average of $80,000 annually; and The Dalles has an 8 percent rate that generates an average $1.2 million annually (Dean Runyan Associates, 2025).

Exhibit 5. Hood River, Sherman, and Wasco Counties TLT Rates and Revenues

City	County	TLT Rate	5-yr Average TLT Revenue
Cascade Locks	Hood River	7.0%	$240,000
Hood River	Hood River	8.0%	$1,850,000
Goldendale	Klickitat	2.0%	$80,000
All of Sherman County	Sherman	1.5%	N/A
Maupin	Wasco	6.0%	$80,000
The Dalles	Wasco	8.0%	$1,160,000

Source: (Dean Runyan Associates, 2025), ECOnorthwest Analysis
Note: Sherman County does not levy a TLT. The 1.5 percent rate is reflecting the rate levied by the State.

Workforce lodging preferences across specific geographies will influence total transient lodging tax (TLT) revenues collected by individual taxing districts. The construction period is anticipated to require rental housing for 648 non-local workers over 30 months.

To estimate potential TLT revenues for the three-county region, two TLT scenarios were analyzed. The lower bound applies the minimum lodging expenditures to the lowest TLT rate (the State rate of 1.5 percent), while the upper bound applies the maximum lodging expenditures to the highest rate of 8.0 percent. The low TLT scenario assumes double occupancy for workers, whereas the high TLT scenario assumes single occupancy. Both calculations incorporate the assumption that construction workers require housing five days per week.

Based on these parameters, projected TLT revenues for the three-county region over the 30-month construction period range from $0.5 million to $5.1 million (see Exhibit 6). In the low TLT scenario, all revenue would flow to the State as this scenario assumes all lodging would be outside a local TLT taxing district (i.e. in Sherman County). In the high TLT scenario, revenue would flow to the State ($960,000) and local taxing districts ($4.2 million).

Exhibit 6. Potential TLT Tax Revenues Over the 30-Month Construction Period

	Assumptions		TLT Tax Revenue		
Scenario	Lodging Expenditure	TLT Rate	State	Local Districts	Total
Low TLT Scenario	$32,050,000	1.5%	$480,000	$0	$480,000
High TLT Scenario	$64,100,000	8.0%	$960,000	$4,170,000	$5,130,000

Source: (Dean Runyan Associates, 2025), ECOnorthwest Analysis
Note: The low scenario assumes double occupancy and that all non-local workers select lodging within approximate one-hour of the Facility site outside of local TLT taxing districts (Cascade Locks, Goldendale, Hood River, Maupin and The Dalles). The high scenario assumes single occupancy and that all non-local workers select lodging within municipalities with a total 8% TLT Rate (Hood River and/or The Dalles).

Works Cited

IMPLAN. (2024). *Occupational Employment (Sherman County, Wasco County, Hood River County, and Klickitat County)*. Retrieved from implan.com

National Laboratory of the Rockies. (2025). *JEDI: Jobs and Economic Development Impact Models*. Retrieved from https://www.nrel.gov/analysis/jedi/models

Sherman County Assessor's Office. (Accessed 2025). Retrieved from https://www.co.sherman.or.us/departments/assessors-office/

U.S. Bureau of Labor Statistics. (2025). *Employer Cost of Employee Compensation for Private Construction Industry*. Retrieved from https://www.bls.gov/news.release/pdf/ecec.pdf

U.S. Census Bureau TIGER/Line Shapefiles. (Accessed 2025). *TIGER/Line Shapefiles*. Retrieved from https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.html

U.S. General Services Administration. (2025). *FY2026 per diem rates for Oregon.* Retrieved from https://www.gsa.gov/travel/plan-book/per-diem-rates/per-diem-rates-results?action=perdiems_report&fiscal_year=2026&state=OR&city=&zip=.

Attachment D-3.
Agricultural Investment Plan

Draft Agricultural Investment Plan

Speedway Energy Facility

Prepared for

Speedway Energy

BGTF Speedway Project LLC

Prepared by

TETRA TECH

July 2026

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List of Attachments

Attachment 1. Agricultural Investment Stakeholder Meeting Log

1.0 Introduction

BGTF Speedway Project LLC (Applicant) proposes to construct the Speedway Energy Facility (Facility), a combined wind, solar, and battery energy storage project in Sherman County, Oregon. The Applicant has submitted an Application for Site Certificate (ASC) to the Oregon Department of Energy (ODOE) and the Energy Facility Siting Council (EFSC) for issuance of a Site Certificate for the Facility under the required contents of an ASC as indicated under Oregon Administrative Rules (OAR) 345-021-0010.

The Facility's site boundary encompasses approximately 24,000 acres of privately owned land zoned as Exclusive Farm Use (EFU). Within the site boundary, discrete areas will be developed for solar arrays, wind turbines, the BESS, and other supporting infrastructure while avoiding sensitive areas and reserving areas for continued agricultural production. Dryland winter wheat is the predominant crop produced within the Facility site boundary with an estimated 10,569 acres currently in winter wheat production, of which approximately 5,285 acres are harvested annually as part of a two-year rotation system. The remainder of the land within the Facility site boundary is either enrolled in the Conservation Reserve Program (CRP), used for grazing, or has other non-crop land cover types. Based on landowner surveys and land cover data, agricultural production within the Facility site boundary is limited to two-year rotation winter wheat production and some cattle grazing. Based on landowner information, only wheat production is expected to be affected by Facility solar operations. While cattle grazing may be displaced from portions of the Facility site occupied by Facility infrastructure, grazing activities are expected to continue elsewhere within the cattle operator's overall grazing areas and are therefore not anticipated to result in a measurable reduction in livestock production.

As the Facility is sited in EFU zoned land, the Facility is subject to the standards under OAR 660-033-0130. Per OAR 660-033-0130(37), wind facilities can be sited in the EFU subject to certain standards that reduce adverse impacts to farmland and thereby make the use compatible with existing and future farm uses. Per OAR 660-033-0130(38), a photovoltaic (PV) solar power generation facility is only allowed in the EFU zone if it meets certain acreage thresholds on arable land and land that meets one of the definitions for high-value farmland under ORS 195.300(10). The solar components of the Facility (Solar Facility; includes associated components shared with the wind facility such as substations, access roads, and collector lines) would occupy up to 8,500 acres within the Facility site boundary and would surpass the acreage limits stipulated for EFU land under OAR 660-033-0130(38). Therefore, the Applicant is seeking an exception for the Solar Facility from Oregon Statewide Planning Goal 3 from EFSC pursuant to ORS 197.732 and OAR Chapter 660, Division 4. The Goal 3 exception request is integrated into the ASC. This Agricultural Investment Plan supports the Applicant's Goal 3 exception request and helps justify why a Goal 3 exception is warranted for the Solar Facility. Once implemented, the investment plan will ensure that any potential adverse impacts to the local agricultural economy from the removal of cultivated wheat land are offset to a level acceptable to Sherman County and the community.

1.1 Goal 3 Exception and Need for Agricultural Investment Plan

Oregon Statewide Planning Goal 3 (Agricultural Lands) (Goal 3) requires counties to identify farmland on its comprehensive plan map, and zone those lands as EFU. An EFU zone places certain restrictions on developments to minimize uses that conflict with farming (DLCD 2023). Oregon Administrative Rule (OAR) Chapter 660, Division 33 and similar provisions under Sherman County Zoning Ordinance (SCZO) Article 3 regulate EFU lands and permitted uses on these lands. The SCZO has not been amended since 2003 and does not reflect the current list of uses and standards provided by OAR 660-033-0130. As a result, the Applicant directly applied OAR 660-033-0130(38)(g), which states that a PV solar power generation facility shall not use, occupy, or cover more than 20 acres of arable land unless certain criteria under OAR 660-033-0130(38)(h) are met or an exception is taken pursuant to Oregon Revised Statutes (ORS) 194.732. Similarly, per OAR 660-033-0130(38)(i), a PV solar power generation facility shall not use, occupy, or cover more than 20 acres of arable lands unless certain criteria under OAR 660-033-0130(38)(i) are met or an exception is taken pursuant to ORS 194.732.

As the Solar Components will occupy more than 20 acres of arable land, it does not meet the acreage standards under OAR 660-033-0130(38)(i) and requires a Goal 3 exception. EFSC may approve an exception to Goal 3 for an energy facility that meets the criteria listed under ORS 469.504(2)(c) and OAR 345-022-0030(4)(c). These criteria include the following:

- Reasons justify why the state policy embodied in the applicable goal should not apply;
- The significant environmental, economic, social and energy (EESE) consequences anticipated as a result of the proposed facility have been identified and adverse impacts will be mitigated in accordance with the EFSC rules applicable to the siting of the proposed facility (EESE consequences); and
- The proposed facility is compatible with other adjacent uses or will be made compatible through measures designed to reduce adverse impacts.

This Agricultural Investment Plan supports the approval of the Applicant's Goal 3 exception request by supporting the "reasons" to justify the Goal 3 exception and ensuring that potential adverse impacts under the EESE consequences are properly mitigated. Measures to address the Solar Facility's compatibility are outlined in the ASC's Exhibit D.

The Applicant justifies a Goal 3 exception by demonstrating that reasons justify removing up to 8,500 acres from Goal 3 protection for up to 30 years. One of the reasons is that the Facility will result in rural local economic development benefits and, specifically, benefits to the local agricultural economy. This Agricultural Investment Plan ensures that the rural local economic benefits will offset potential adverse impacts the Solar Facility may have on Sherman County's agricultural economy. In addition, participating landowners—many of whom represent multigenerational farm families—have emphasized that solar development provides an opportunity to diversify income and strengthen long-term financial stability, which in turn can help prevent future fragmentation of agricultural land holdings. This landowner perspective reinforces

the rationale for a Goal 3 exception, as the Facility not only contributes to rural economic development but also supports the continuity of agricultural operations across generations.

2.0 Development of the Plan

To help inform the development of the Agricultural Investment Plan, the Applicant conducted in-person and virtual meetings with a variety of agricultural stakeholders involved in the Sherman County agricultural community. Stakeholders included representatives of Sherman County Board of Commissioners (BOC)/County Court, Sherman County Farm Bureau, Sherman County Emergency Services, South Sherman Fire District, Sherman County Weed Department, Sherman County Planning Department, City of Grass Valley City Council, Oregon Wheat Growers' League and Wheat Commission, Oregon State University (OSU) Sherman County Extension Service, OSU College of Agricultural Sciences, NW Grain Growers, Mid-Columbia Economic Development District (MCEDD), and Sherman County Soil and Water Conservation District. A meeting log and summary of key themes from these meetings is attached (Attachment 1). The meetings discussed the Facility and the concept of mitigating for the economic impacts from the reduction in wheat production due to the Facility's footprint. In many of the meetings the Applicant's outreach team (Hubbell Communications) discussed the agricultural investment/mitigation plan from other solar facilities in eastern Oregon and north Sherman County. One of these facilities has an agricultural mitigation plan that included partnership with MCEDD, who would manage the mitigation fund and establish a selection committee to oversee the distribution of the fund by reviewing proposals for mitigation projects against the plan's selection criteria and recommending selected projects for final approval by the Sherman County Board of Commissioners/County Court. That mitigation plan also provided a list of "Pre-Screened Projects" that could bypass the selection committee and go straight to the County Court for approval. Some of the key feedback received from the meetings held by the Applicant included the following:

- Ensure there is a Sherman County-based active wheat producer on the selection committee established by the plan.
- Ensure representation from South Sherman County community members on the selection committee.
- Require all proposed mitigation projects to go through the local selection committee process and remove "pre-selected projects" wording – or reframe wording to clearly define "sample" projects.
- Refer to Sherman County Community Wildfire Protection Plan (CWPP) for any proposed fire-related projects.
- Preference for wheat-related mitigation funding via existing programs and institutions – notably, OSU's wheat research programs and the Sherman Experiment Station.

Potential mitigation projects proposed by interviewed stakeholders included:

- OSU wheat research funding via the Sherman Experiment Station endowment fund.
- Next-generation farmer employment opportunities via Future Farmers of America (FFA), 4-H, and Columbia Gorge Community College.
- Wildfire risk mitigation to reduce crop damage and health and safety risks across the region – including noxious weed control, vegetation management, and tilling impacts.

Stakeholders seemed to be amenable to the concept of establishing a local selection committee to review and recommend projects for funding but wanted to remove the pre-selected projects concept. Some stakeholders wanted to see funded mitigation projects be tied to wheat-related impacts and existing agricultural institutions (i.e. OSU Extension, Farm Bureau), while others wanted to see broader representation on the selection committee and south Sherman County representation.

Taking this feedback into consideration, this Agricultural Investment Plan follows the other mitigation plan example but requires all mitigation/agricultural investment projects to be screened by the selection committee and removes the concept of pre-selected projects. See Section 4.0 for more details.

3.0 Overview of Project Impacts on Agricultural Economy

The Applicant contracted ECOnorthwest to assess the economic impacts of removing land associated with the permanent footprint of the Solar Facility from agricultural production (see Agricultural Impact Analysis, Attachment D-1 to Exhibit D – Land Use of the ASC). In support of the ASC and the Agricultural Impact Analysis, the Applicant conducted a landowner survey of the properties within the site boundary. Based on the available survey information, only wheat production is expected to be affected by the Facility operations. While cattle grazing may be displaced from portions of the Facility site occupied by Facility infrastructure, grazing activities are expected to continue elsewhere within the cattle operator's overall grazing areas and are therefore not anticipated to result in a measurable reduction in livestock production. Wheat yields for these operations are reported by the landowners to average 37.5 bushels per acre over the past 5 to 10 years. The reported yield is lower than the Sherman County 10-year normalized average of 51 bushels per acre but are consistent with the National Resources Conservation Service (NRCS) soil productivity estimates for dryland winter wheat for the soils within the Facility site boundary, which average 36 bushels per acre (USDA NRCS Web Soil Survey, 2026).

To estimate the magnitude of the potential impact of the Facility from removal of wheat production in the Facility footprint, the Agricultural Impact Analysis (Attachment D-1) estimated the wheat production value of the affected acres and then modeled the direct, indirect, and induced economic impacts of the wheat production lost from the conversion to the Solar Facility. This analysis relies upon publicly available data, published crop reports, regional trends, and local expert opinion.

The Agricultural Impact Analysis used the Facility's preliminary layout to estimate an acreage of wheat removed from production to estimate the production value and model the economic impacts. The estimated acreage affected by the Facility each year was 4,659 acres. Using a price of $6.12 per bushel, estimated annual production value of winter wheat sales for the 4,659 acres of cultivated wheat land affected by the Solar Facility is estimated at $534,000. The Agricultural Impact Analysis used this estimated production value to model the indirect economic activity supported by the affected wheat production within Sherman County. The indirect economic impact represents the decrease in economic activity supported by the agricultural production of land within the affected wheat acres. Because the wheat operations purchase some of their inputs within Sherman County, it supports additional economic activity through spending on items such as fuel, fertilizer, seed, and equipment. Crop production within the affected acres supports 1.8 FTE indirect jobs associated with $116,000 in labor income. The estimated indirect economic output is $232,000 annually. Calculated over a period of 30 years of operation, and adjusting for inflation, the estimated indirect output would be $4,547,302 or $976 per acre of farmland taken out of production.

The final payments will be based on the actual acres identified in the final design of the Solar Facility, which may be less or more than the 4,659 acres identified in the Agricultural Impact Analysis.

4.0 Agricultural Investment Fund

The Applicant plans to partner with Sherman County and MCEDD to establish an agricultural investment fund that will administer and distribute dollars for projects having a benefit to the Sherman County agricultural economy. The fund will ensure that any potential adverse impacts from the Solar Facility are offset to levels acceptable to Sherman County and the community. The investment fund will be managed locally to ensure there is local control over investment decisions. All investment fund allocations will first be screened by a selection committee of local stakeholders and ultimately be approved by the Sherman County Court to ensure alignment with community priorities and accountability to local stakeholders.

4.1 Establishing the Speedway Agricultural Investment Fund

MCEDD will administer the Speedway Agricultural Investment Fund (Investment Fund) under an Administrative Agreement among Sherman County, MCEDD, and the Applicant (Parties). A Memorandum of Understanding (MOU) will be negotiated between MCEDD and the Applicant and will describe the coordination and framework for administering the Investment Fund. The Parties anticipate that the MOU will be executed prior to the start of construction of the Solar Facility.

Prior to construction, $976 per acre for each acre the Solar Facility removes from wheat production will be placed into the Speedway Agricultural Investment Fund account that will then be used to fund agricultural investment projects under the Agricultural Investment Plan. The total number of acres removed from wheat production by the Speedway Solar Facility will be determined based on

the final layout confirmed during the Oregon Department of Energy pre-construction compliance review. The payment may be provided by the Applicant or another entity on behalf of the Applicant.

4.2 Administration of the Speedway Agricultural Investment Fund

MCEDD will administer the Speedway Agricultural Investment Fund, which will be funded prior to construction of each phase of the Solar Facility. MCEDD will also oversee the following administrative steps.

4.2.1 Selection Committee

MCEDD will form and oversee a six-person advisory committee (Selection Committee) to review applications for funding and make recommendations to Sherman County BOC/County Court on funding projects. The Selection Committee will comprise the following individuals, and for each individual selected, to the extent practicable, individuals should have Sherman County specific experience/expertise:

- One representative from Sherman County government;
- One representative from an academic institution engaged in agriculture research in Sherman County (i.e. the OSU Extension office located in Moro, Oregon) or an agricultural-related nonprofit entity located in Sherman County;
- One dryland farm producer from South Sherman County;
- One community member from South Sherman County with agricultural-related experience;
- One representative with expertise in wildfire as it relates to agricultural lands (if practicable, someone with Sherman County specific experience); and
- One representative from the Oregon Wheat Growers League.

Sherman County will have the ability to propose candidates for the Selection Committee in accordance with the aforementioned criteria, provided that the County proposes candidates within 30 calendar days of the formation of the committee. If the County elects not to propose candidates to the Selection Committee, MCEDD shall make any remaining necessary appointments.

In addition to the members above, the Selection Committee shall include one non-voting member with subject matter expertise over statewide or regional agriculture issues selected by EFSC.

4.2.2 Applications for Funding

MCEDD shall issue a notice of available funding for agricultural investment projects as contemplated in the MOU. The notice will identify the selection criteria for qualifying projects and include an application form. All applications for funding would need to be filed with MCEDD at a time determined by the parties, ahead of the Start of Construction (Application Deadline).

4.2.3 Awarding Funds

The Selection Committee will review applications, rank the projects against the selection criteria, and make recommendations to the Sherman County BOC within 3 months of the application deadline. The BOC will aim to make a decision on funding within 60 days of receipt of the Selection Committee's recommendation. MCEDD will award funds within 30 days of the County's decision.

4.2.4 Selection Criteria

The selection criteria for a qualified agricultural investment project are to ensure that projects provide uplift of the Sherman County agricultural economy and are responsive to community needs as described in Section 2.0 and as may be identified by the community in the future.

The Selection Committee will apply and balance the selection criteria when recommending projects for funding. The four selection criteria are as follows:

1. Improving resiliency and efficiency of Sherman County's agricultural economy;
2. Improving agricultural wildfire protection and risk management capacity;
3. Investing in research to further dryland wheat farming; and
4. Investing in agricultural education for next-generation farmers.

4.3 Reporting Obligations

Award recipients shall provide an annual report to the County, MCEDD, and the Applicant, as further described in the MOU.

5.0 References

DLCD (Department of Land Conservation and Development). 2023. Oregon's Statewide Land Use Planning Goals. Oregon Planning. https://www.oregon.gov/lcd/OP/Pages/Goals.aspx

USDA NRCS Web Soil Survey (U.S. Department of Agriculture - National Resources Conservation Service). 2026. Yields of Non-Irrigated Crops, Winter Wheat, Sherman County, Oregon. Retrieved from National Cooperative Soil Survey: https://websoilsurvey.nrcs.usda.gov/app/

Attachment 1. Agricultural Investment Stakeholder Meeting Log

Agricultural Investment/Mitigation Stakeholder Meeting Log

Speedway Energy Facility – Sherman County, OR

Main Themes

- **Ensure there is a Sherman County-based active wheat producer on the selection committee**

  Recommended by*: Sherman County Farm Bureau, Oregon Wheat Growers League and Wheat Growers Commission, Sherman County Planning*

- **Ensure representation from South Sherman County community members - including non-farm and non-fire stakeholders - on the selection committee**

  Recommended by*: Sherman County Emergency Services, Sherman County Planning*

- **Require all proposed mitigation projects to go through the local selection committee process and remove 'pre-selected projects' wording – or reframe wording to clearly defined 'sample' projects**

  Recommended by: *Mid-Columbia Economic Development District (MCEDD) and Sherman County Court*

- **Refer to Sherman County Community Wildfire Protection Plan (CWPP) for fire-related projects**

  Recommended by: *Sherman County Emergency Services*

- **Preference for wheat-related mitigation funding via existing programs and institutions – notably, OSU's wheat research programs and the Sherman Experiment Station**

  Recommended by: *Oregon Wheat Growers League & Commission, OSU Extension, Sherman County Farm Bureau, NW Grain Growers*

Potential mitigation projects proposed by stakeholders

- **OSU wheat research funding via the Sherman Experiment Station endowment fund**

  Recommended by: Oregon Wheat Growers League & Commission, OSU Extension, Sherman County Farm Bureau

- **Wildfire risk mitigation - including noxious weed control, vegetation management, and tilling impacts**

  Recommended by: Sherman County Emergency Services, OSU Extension, Sherman County Weed District

- **Next-generation farmer employment opportunities via FFA, 4-H, and Columbia Gorge Community College**

  Recommended by: MCEDD

Pros about the Biglow plan:

- **Using MCEDD to manage mitigation funding** *(Sherman County Court, MCEDD)*

- **Using a local selection committee to review and recommend projects** *(Sherman County Court, Oregon Wheat Growers League & Commission, Sherman County Planning, Sherman County Emergency Services)*

- **Keeping mitigation funding tied to wheat-related impacts and existing agriculture institutions** *(Oregon Wheat Growers League & Commission, OSU Extension, Sherman County Farm Bureau, NW Grain Growers)*

Negatives about the Biglow plan:

- **Preference for putting all proposed projects through a selection committee, avoiding pre-selected or pre-approved projects** *(Sherman County Court, MCEDD)*

- **Need representation from non-farming and non-fire related stakeholders, especially in the southern part of Sherman County** *(Sherman County Emergency Services)*

Engagement-to-date

- Logan Padget, Sherman County Farm Bureau
- Dr. Chad Higgins, Oregon State University (OSU) College of Agricultural Sciences
- Jacob Powell, OSU Extension
- Amy Phelps, Sherman County Planning
- Dana Pursley-Haner, Sherman County Emergency Services
- Amanda Hoey, Oregon Wheat Growers' League and Wheat Commission
- Michelle Colby, Mid-Columbia Economic Development District (MCEDD)
- Judge Joe Dabulskis, Sherman County Board of Commissioners/County Court
- Amanda Whitman, Sherman County Soil and Water Conservation District (SWCD)
- David Rooney, Sherman County Weed District
- Chief Bert Norris, South Sherman Fire District
- Mayor Jacob Ayles, Grass Valley City Council

March 9, 2026

David Rooney, Sherman County Weed District

- **Takeaways**
  - Did not provide direct input on the ag mitigation plan, instead expressing more concern over resource availability for weed control (e.g., spraying equipment, manpower, contracting) for future projects in the county.
  - Provided initial feedback on ground cover and vegetation management for Speedway
- **Recommendations**
  - No clear recommendation, keep engaged as project progresses

March 11, 2026

Judge Joe Dabulskis, Sherman County Court

- **Takeaways**
  - Met in person to specifically talk about Ag mitigation
- **Recommendations**
  - Using MCEDD to administer ag mitigation funding
  - Avoid "preselected" projects
  - Emphasized local representation on board (From South Sherman County would be best. Noted difference in farm practices between North and South ends of the county, south is underrepresented in most forums)

Bert Norris, South Sherman Fire District

- **Takeaways**
  - Met in-person and discussed broad project collaboration on multiple phone calls.
  - Did not provide direct input on the ag mitigation plan
- **Recommendations**
  - No clear recommendation, keep engaged as project progresses

Mayor Jacob Ayles, Grass Valley City Council

- **Takeaways**
  - Engaged to inform Mayor ag mitigation work is in process, discussed future community benefits and SIP/PILOT funding opportunities
- **Recommendations**
  - No clear recommendation, keep engaged as project progresses

March 18, 2026

Logan Padget, Sherman County Farm Bureau

- **Takeaways**:
  - Soil is thinnest on south-facing slopes
  - NW Grain Growers supports local wheat economy, recommend meeting with them on mitigation needs
  - Wheat tax (5 cents per bushel) supports wheat commission, who advocates for wheat farmers in policy discussions - make sure those funds go to wheat commission, OSU Sherman County extension has an endowment for local wheat research
  - Local fuel companies take a hit from lack of wheat production, ECOnorthwest will take that into consideration in ag impacts report

- **Recommendations**:
  - Set meeting with NW Grain Growers CEO (Chris Pena) to discuss:
    - Financial support for local wheat infrastructure (grain elevators, etc.)
  - Ensure investments go towards wheat-related mitigation efforts

Dr. Chad Higgins, OSU Agrivoltaics

- **Takeaways**
  - Biglow may end up not choosing agrivoltaics in ag mitigation plan given the poor soil within site
  - The locals will want you to mitigate dust and erosion, noxious weeds, fire risks - and there are approaches to solving all three
  - Agrivoltaics
    - Have a handful of developers on board for industry-engagement, need dollars from more than just Brookfield to fully fund agrivoltaics feasibility
    - Alfalfa, etc. is possible with agrivoltaics - wheat is grown in Sherman county because it's the only crop that can thrive locally
    - Alexis Eichler (OSU Foundation) handles money negotiations
    - Dr. Higgins pursuing U.S. NSF grant addressing fire risk at human / natural interface to pay for agrivoltaics research ~ if Speedway is willing to write a letter, that would be great
- **Recommendations**
  - Engage fellow developers on shared agrivoltaics project funding (does not have to be in Sherman County)
  - With that said, agrivoltaics does not pencil in Sherman County due to poor soil quality and lack of water

March 19, 2026

Amy Phelps, Sherman County Planner

- **Takeaways**:
  - Renewable energy projects broadly are polarized, need to get local (Grass Valley, Moro) input on ag mitigation framework
- **Recommendations**
  - Ensure there is an 'active wheat farmer in South Sherman County' on selection committee

Dana Pursley-Haner, Sherman County Emergency Services

- **Takeaways**:
  - Strong emphasis on engagement with SWCD
  - Gap identified in engagement with "everyday" community members (non-farm, non-fire stakeholders), especially in South County towns (Moro, Grass Valley, Wasco), representation on ag mitigation board
  - Highlighted importance of aligning with the Community Wildfire Protection Plan (CWPP) as a framework connecting ag mitigation with wildfire resilience
- **Recommendations**
  - Engage with Sherman County SWCD
  - Include a non-farming, non-fire community representative from South Sherman County on the ag mitigation selection committee
  - Review and integrate the Sherman County CWPP (2024) into ag mitigation strategy

March 23, 2026

Amanda Hoey, Oregon Wheat Grower's League and Commission

- **Takeaways**:
  - Wheat Commission = focused on wheat research, investment
  - Wheat League = focused on representing, engaging wheat producers
- **Recommendations**
  - Supporting OSU Sherman County Extension Endowment fund
  - "We don't want administrative burden, so plug into existing endowment funds"
  - Have an active wheat producer on selection committee

Michelle Colby, MCEDD

- **Takeaways**:
  - MCEDD is administrator, no decision-making authority
  - MCEDD reviews proposed projects
  - Some are pre-approved, some are not pre-approved
  - If pre-approved, MCEDD passes on to Sherman County Court, no selection committee consultation
  - If not pre-approved, MCEDD reviews to make sure it satisfies Goal 3 exception, once passed, goes to Sherman County Court
  - Pre-approved projects may receive some local pushback

  - Brookfield shared awareness of housing issue, MCEDD understands housing issue and is pleased to hear ECOnorthwest impact report takes that into account
- **Recommendations**
  - Sherman County prefers ALL projects go through selection committee
  - Action - proposed projects are fine
  - Explore employment opportunities for next-gen farmers
    - FFA
    - Sherman County 4-H
    - Columbia Gorge Community College
  - Share ECO study with MCEDD ~ when it's ready

March 25, 2026

Dr. Jacob Powell, OSU Extension

- **Takeaways**:
  - Jacob works on:
    - Applied wheat research ~ some funded via Wheat Commission
    - Works directly with Sherman Experiment Station
    - Works directly with wheat producers
  - Wildfire a big local issue - tilling impacts, noxious weed mitigation, wheat impacts
  - There are pros and cons on energy development, but Jacob sees benefits for economic support ~ i.e., wheat prices aren't performing well
  - On 4-H / FFA ~ lots of overlap locally in Sherman County. Jacob does work with both groups, SIP would direct financial support to both.
  - On wheat commission, less wheat bushels leads to less funding for OSU Wheat research and Moro experiment center
- **Recommendations**
  - Jacob has recommendations on ideal wheat varieties and soil types to best mitigate wildfire impacts – keep in the loop on mitigation process
  - Outreach to Sherman Experiment Center Liaison Committee on endowment fund

April 10, 2026

Amanda Whitman, Sherman County Soil and Water Conservation District (SWCD)

- **Takeaways**
  - Initial conversation to introduce project to Amanda Whitman
  - Follow up calls with SWCD board during NOI phase to present project and attempt to mitigate concerns around application
  - Attended April SWCD Monthly meeting for in-person introductions and notify board of PIM
- **Recommendations**
  - No clear recommendation, keep engaged as project progresses

May 5, 2026

Chris Peha and Keegan Gibbs, NW Grain Growers

- **Takeaways**
  - NW Grain Growers concerned with CRP, leasing to renewable energy developments - takes out farmland, reduces wheat employment, reduces school enrollment
  - Any wheat land taken out of production is bad for grain growers' business
  - Wants clarity around how much EFU land Speedway takes up
  - Wheat producers pay a state-imposed 5 cent tax on wheat products -> goes toward wheat research at OSU (grain quality, yield, etc.)
  - Wheat producers are concerned about wildfire issue - what happens when one fire spreads to another property owner?
  - Appreciated time to meet with project team, trying to understand local wheat impact so they can prepare
- **Recommendations**
  - When known, share EFU acreage taken out of production with Chris and Keegan
  - Keep involved on mitigation framework

Attachment D-4. Confirmation of Applicable Sherman County Code Provisions

Grace, Jordan

From: Amy Phelps <aphelps@shermancountyor.gov>
Sent: Wednesday, March 4, 2026 8:50 AM
To: Grace, Jordan
Subject: RE: Speedway Energy Project - Land Use Standards

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

As discussed, those are the current standards.

SHERMAN COUNTY

Amy Phelps
Sherman Community Development Director/County Planner
Pronouns: she/her

PO Box 381
Moro, OR 97039
aphelps@shermancountyor.gov
phone- 541-565-3601
Fax- 541-565-3078

From: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Sent: Wednesday, March 4, 2026 8:34 AM
To: Amy Phelps <aphelps@shermancountyor.gov>
Subject: RE: Speedway Energy Project - Land Use Standards

Thank you, Amy. Are you able to confirm that the attached table accurately captures all applicable standards?

Jordan Grace (he/him)
Mobile **+1 (714) 580-9006**

From: Amy Phelps <aphelps@shermancountyor.gov>
Sent: Tuesday, March 3, 2026 2:22 PM
To: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Subject: RE: Speedway Energy Project - Land Use Standards

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Jordan,

Here are the Goal 5 resource maps that includes aggregate resources, historical and cultural resources, wildlife, and land use.

From: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Sent: Wednesday, February 25, 2026 2:36 PM
To: Amy Phelps <aphelps@shermancountyor.gov>
Subject: Speedway Energy Project - Land Use Standards

Hi Amy,

Thanks for taking the time to chat. As discussed, could you please:

1. Confirm the attached table accurately captures all applicable standards?
2. Identify Goal 5 resources within the site boundary (as part of the Significant Resources Combining Zone), and send copies of applicable paper maps?

Thank you,

Jordan Grace (he/him)
Mobile **+1 (714) 580-9006**

From: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Sent: Monday, February 2, 2026 3:02 PM
To: Amy Phelps <aphelps@shermancountyor.gov>
Subject: RE: Speedway Energy Project - Land Use Standards

Hi Amy,

Following up on this request. In a previous correspondence you confirmed the County documents I sent/linked (Zoning Ordinance, Wind Ordinance, and Comp Plan) were the latest versions and the only documents with applicable standards.

Now that the site boundary KMZ works and you've been digging into the applicable County maps, could you please confirm the applicable standards?

Applicable standards

- I've reviewed the County documents listed above and identified the applicable standards in the attached Word document. I understand some provisions were listed in the NOI comment letter; however, the Word document attached contains additional provisions (from the zoning ordinance, and the comp plan + wind ordinance).
- Can you confirm I've accurately captured all applicable standards? Please let me know if the table is missing any provisions or includes provisions that don't apply.
- Note that I've inserted a couple comments with questions for you in the document.

Thank you,

Jordan Grace (he/him)
Mobile **+1 (714) 580-9006**

From: Amy Phelps <aphelps@shermancountyor.gov>
Sent: Monday, January 26, 2026 11:20 AM
To: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Subject: RE: Speedway Energy Project - Land Use Standards

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Good morning Jordan,
Thank you for your patience. All of my maps are paper, so it took a little time. I have attached the PDF of the comprehensive plan zoning map. I will need to double check if there are any new rock quarries that are not listed on this map and I will hope to have that to you by end of the week.

SHERMAN COUNTY

Amy Phelps
Sherman Community Development Director/County Planner
Pronouns: she/her

PO Box 381
Moro, OR 97039
aphelps@shermancountyor.gov
phone- 541-565-3601
Fax- 541-565-3078

From: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Sent: Tuesday, January 13, 2026 10:35 AM
To: Amy Phelps <aphelps@shermancountyor.gov>
Subject: Speedway Energy Project - Land Use Standards

Hi Amy, circling back on this again. Please let me know if there's anything I can do to support your confirmation of the applicable standards.

Thank you,

Jordan Grace (he/him)
Mobile **+1 (714) 580-9006**

From: Grace, Jordan
Sent: Thursday, January 8, 2026 12:34 PM
To: Amy Phelps <aphelps@shermancountyor.gov>
Subject: Speedway Energy Project - Land Use Standards

Hi Amy, following up on this – please let me know if there's anything I can do to support. Your confirmation of this piece is integral to our land use analysis and greatly appreciated.

Jordan Grace (he/him)
Mobile **+1 (714) 580-9006**

From: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Sent: Monday, January 5, 2026 4:04 PM
To: Amy Phelps <aphelps@shermancountyor.gov>
Subject: RE: Speedway Energy Project - Land Use Standards

Hi Amy,

Glad to hear! Sometimes technology can be so fickle.

In a previous correspondence you confirmed the County documents I sent/linked (Zoning Ordinance, Wind Ordinance, and Comp Plan) were the latest versions and the only documents with applicable standards.

Now that the site boundary KMZ works, could you please confirm the applicable standards?

Applicable standards

- I've reviewed the documents listed above and identified the applicable standards in the attached Word document. I understand some provisions were listed in the NOI comment letter; however, the Word document attached contains additional provisions (from the zoning ordinance, and the comp plan + wind ordinance).
- Can you confirm I've accurately captured all applicable standards? Please let me know if the table is missing any provisions or includes provisions that don't apply.
- Note that I've inserted a couple comments with questions for you in the document.

Thank you,

Jordan Grace (he/him) | Environmental Planner
Direct **+1 (503) 727-8074** | Mobile **+1 (714) 580-9006** | jordan.grace@tetratech.com

From: Amy Phelps <aphelps@shermancountyor.gov>
Sent: Monday, January 5, 2026 3:46 PM
To: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Subject: RE: Speedway Energy Project - Land Use Standards

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

Good afternoon Jordan,

This is my first day back in office. And Thank you for resending the file. It opened right up, not sure why?

Please let me know if you have any additional questions,

Amy Phelps
Sherman Community Development Director/County Planner
Pronouns: she/her

PO Box 381
Moro, OR 97039
aphelps@shermancountyor.gov
phone- 541-565-3601
Fax- 541-565-3078

From: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Sent: Tuesday, December 30, 2025 12:59 PM
To: Amy Phelps <aphelps@shermancountyor.gov>
Subject: Speedway Energy Project - Land Use Standards

Hi Amy,

Circling back on this before the new year. Please see my message below and let me know if you're able to open the file.

Thank you,

Jordan Grace (he/him) | Environmental Planner
Direct **+1 (503) 727-8074** | Mobile **+1 (714) 580-9006** | jordan.grace@tetratech.com

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From: Grace, Jordan
Sent: Tuesday, December 23, 2025 3:56 PM
To: 'Amy Phelps' <aphelps@shermancountyor.gov>
Subject: RE: Speedway Energy Project - Land Use Standards

Hi Amy,

Yes, the .kmz file I sent was the site boundary – I'm resending it here. I just tried opening it in Google Earth and it worked on my end. Hopefully it works for you this time too. Please let me know either way.

Thank you,

Jordan Grace (he/him) | Environmental Planner
Direct **+1 (503) 727-8074** | Mobile **+1 (714) 580-9006** | jordan.grace@tetratech.com

---

From: Amy Phelps <aphelps@shermancountyor.gov>
Sent: Tuesday, December 23, 2025 9:22 AM
To: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Subject: RE: Speedway Energy Project - Land Use Standards

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

Good morning Jordan,

I couldn't open the .kmz file which is I am guessing the boundary map? Could you please try to resend?

The documents that you have listed are the current documents. You may also want to familiarize yourself with natural hazards for this location especially wildfires. And without seeing the map/boundary lines, there are multiple creeks and a floodplain that you may have to be familiar with as well.

Thank you,



Amy Phelps
Sherman Community Development Director/County Planner
Pronouns: she/her

PO Box 381
Moro, OR 97039
aphelps@shermancountyor.gov
phone- 541-565-3601
Fax- 541-565-3078

From: Grace, Jordan <JORDAN.GRACE@tetratech.com>
Sent: Friday, December 19, 2025 2:55 PM
To: Amy Phelps <aphelps@shermancountyor.gov>
Subject: Speedway Energy Project - Land Use Standards

Hi Amy,

It was great to meet you yesterday. As discussed, I'm hoping you can confirm the Sherman County land use standards that apply to the Speedway Energy Project.

Confirmation of County documents

- In my initial review, I've identified the following as applicable – can you please confirm (1) these are the only documents with applicable standards, and (2) the versions linked or attached are the most current/up to date:
  - Sherman County Zoning Ordinance – most current version is dated Oct 15, 2017 and accessible **here**.
  - Sherman County 2007 Wind Power Ordinance – the most current version is Ordinance No. 39-2007, dated Nov 21, 2007 and attached to this email.
  - Sherman County Comprehensive Plan – most current version is dated Oct 16, 2017 and accessible **here**.

Applicable standards

- I've reviewed the documents listed above and identified the applicable standards in the attached Word document. Can you please confirm I've accurately captured all applicable standards? Note that I've inserted a couple comments with questions for you in the document.

Site Boundary

- See attached KMZ depicting the Project's site boundary

We greatly appreciate your time and support on this.

Thank you,

Jordan Grace (he/him) | Environmental Planner
Direct **+1 (503) 727-8074** | Mobile **+1 (714) 580-9006**

Tetra Tech | Complex World, Clear Solutions™
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