

Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit O. State and Local Laws and Regulations

Part 1. Wetlands and Other Waters

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



BGTF Speedway Project LLC

Prepared by



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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
Applicant	BGTF Speedway Project LLC
EFSC	Oregon Energy Facility Siting Council
ESH	Essential Salmonid Habitat
Facility	Speedway Energy Facility
NHD	National Hydrography Dataset
NWI	National Wetlands Inventory
OAR	Oregon Administrative Rules
ODSL	Oregon Department of State Lands
ORS	Oregon Revised Statutes
SWI	Statewide Wetland Inventory
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
WOTUS	Waters of the United States

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 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 Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary.

Exhibit O1 presents information supporting demonstration of compliance with the State and Local Laws and Regulations approval standard and submittal requirements in Oregon Administrative Rules (OAR) 345-022-0160.

2.0 Wetlands and Other Waters – OAR 345-022-0160(1)(a)(A)

OAR 345-022-0160 To assist the Council in determining compliance with all state and local laws and regulations applicable to EFSC and the siting process, submit the following, as directed by the project order described in OAR 345-015-0160:

(1) Regarding Water

(a) Information based on literature and field study, as appropriate, about waters of this state, as defined under ORS 196.800, including:

(A) A description of all areas within the site boundary that might be waters of this state and a map showing the location of these features;

2.1 Definitions

Oregon Revised Statutes (ORS) 196.800(15) defines “Waters of the State” as:

All natural waterways, tidal and non-tidal bays, intermittent streams, constantly flowing streams, lakes, wetlands, that portion of the Pacific Ocean that is in the boundaries of this state, all other navigable and non-navigable bodies of water in this state and those portions of the ocean shore, as defined in ORS 390.605, where removal or fill activities are regulated under a state-assumed permit program as provided in 33 United States Code 1344(g) of the Federal Water Pollution Control Act, as amended.

2.2 Delineation Methods

Prior to field work a desktop analysis of the Wetland Study Area (see Figure O1-1) was conducted to ensure all mapped wetlands and streams would be investigated during the time of the survey. The Statewide Wetland Inventory (SWI; ODSL 2025) was reviewed and includes the following resources:

- National Wetland Inventory (NWI)
- National Hydrography Dataset (NHD)
- Essential Salmonid Habitat (ESH)
- Predominantly Hydric Soil Map Units

All NWI and NHD features were investigated to determine if aquatic features were present (Figure O1-1). Multiple years of aerial images were reviewed; areas that appeared to be saturated or inundated, or have distinct changes in vegetation, or areas that appeared to be greener than surrounding vegetation were flagged and investigated in the field. Bare earth Light Detection and Ranging (LiDAR) hillshade data (DOGAMI 2025) were reviewed to identify depressions and swales or valleys that were not already mapped with a NWI or NHD feature and were also flagged and investigated in the field. Most of the wetland boundaries were mapped based on a distinct change in dominant wetland vegetation or the presence or absence of hydrology indicators. If a stream was less than 6 feet wide, the centerline was collected and maximum width recorded. If a stream was greater than 6 feet wide, the ordinary high-water line was collected as a polygon. The flow duration of the streams mapped were recorded as ephemeral, intermittent, or perennial. Wetlands were classified based on Classification of Wetlands and Deepwater Habitats of the United States (Cowardin et al. 1979) and the Guidebook for Hydrogeomorphic (HGM) based Assessment of Oregon Wetland and Riparian Sites (Adamus 2001).

Delineations were conducted utilizing techniques published in the 1987 USACE Wetlands Delineation Manual (Environmental Laboratory 1987), the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West (USACE 2008), and OARs for Wetland Delineations (Chapter 141, Division 90).

2.3 Delineation Results

The Wetland Survey Area (see Figure O1-1) was investigated in the field on May 13-17, 2024, June 24-28, 2024, April 9-19, 2025, and April 20-26, 2026. Figure O1-2 represents all mapped wetlands and other waters within the Wetland Survey Area. A total of 50 wetlands and 215 other waters were mapped. Rosebush Creek and hydrologically connected wetlands to Rosebush Creek are considered ESH. There are no Aquatic Resources of Special Concern within the Facility boundaries.

Table O1-1. Summary of All Wetlands and Other Waters Features

Feature Type	Number of Features	Area (acre)	Length (ft)
Wetlands	50	46.70	-
Streams (Perennial)	2	-	836
Streams (Intermittent)	38	-	68,271
Streams (Ephemeral)	132	-	171,436
Ponds	28	10.69	-
Roadside Ditches	15	-	7,034

Ephemeral waters are not regulated by the Oregon Department of State Lands (ODSL) based on OAR 141-085-0510(107). Irrigation ditches are not considered jurisdictional if features meet all requirements of OAR 141-085-0515(9). The delineation report was submitted to the ODSL December 10, 2025, and assigned number WD2025-0687. ODSL has reviewed the delineation report and requested additional information on June 5, 2026. A revised delineation report with 2026 survey results and responses to the June 5 requests for additional information will be submitted to ODSL in August 2026. ODSL will provide a concurrence letter that lists which features are considered waters of the state and which features are not jurisdictional.

Regarding federal jurisdiction, it is likely that only intermittent, perennial streams and wetlands with a relatively permanent and contiguous surface connection to the John Day River or Deschutes River will be considered Waters of the United States (WOTUS). The Applicant will work directly with the U.S. Army Corps of Engineers (USACE) regarding federal jurisdiction and potential permitting.

Table O1-2. Potential Waters of the State

Feature Type	Number of Features	Area (acre)	Length (ft)
Wetlands	50	46.70	–
Streams (Perennial)	2	-	836
Streams (Intermittent)	38	-	68,271
Ponds	14	4.67	–

3.0 Effects on Waters of the State – OAR 345-022-0160(1)(a)(B)

(B) An analysis of whether construction or operation of the proposed facility would adversely affect any waters of this state;

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.

3.1 Significance of Impacts – OAR 345-022-0160(1)(a)(C)

(C) A description of the significance of potential adverse impacts to each feature identified in (A), including the nature and amount of material the applicant would remove from or place in the waters analyzed in (B);

Construction methods include boring under Rosebush Creek and other waters of the state to ensure there are no permanent impacts to these resources. Boring under aquatic resources does not trigger the need for a Removal-Fill authorization unless the entry and exit points are within jurisdictional boundaries. All proposed boring entry and exit points are outside of jurisdictional boundaries. The proposed transmission line poles are outside of jurisdictional boundaries; the

overhead lines will not trigger the need for a Removal-Fill authorization. There are five narrow intermittent streams that will be temporarily impacted (Table O1.3). All other waters of the state have been avoided. The significance of the proposed temporary impacts is minor. The narrow widths of these seasonal streams vary from 1 to 5 feet wide. The applicant proposes to trench and bury collector lines when the streams are dry. The sites will be restored to their original contours, and flow will not be affected.

Table O1-3. Summary of Impacts to Jurisdictional Features

Feature Type	Number of Permanent Impact Sites	Number of Temporary Impact Sites	Total Number of Features Impacted
Streams (Intermittent)	0	5	5

3.2 Removal-Fill Information – OAR 345-022-0160(1)(a)(D)(E)

(D) If the proposed facility would not need a removal-fill authorization, an explanation of why no such authorization is required for the construction and operation of the proposed facility;

(E) If the proposed facility would need a removal-fill authorization, information to support a determination by the Council that the Oregon Department of State Lands should issue a removal-fill permit, including information in the form required by the Department of State Lands under OAR Chapter 141 Division 85; and

A removal-fill permit is required if more than 50 cubic yards of material is removed or filled within wetland boundaries or below the ordinary high-water line of other waters. A removal-fill permit is required for any material that is removed or filled in ESH. There are no impacts proposed to ESH aquatic resources. Removal and fill volume is greater than 50 cubic yards in water of the state, and an authorization will be required from ODSL. General Authorizations can be applied for when proposed impacts would have minimal impacts to waters of the state. The proposed temporary impacts are listed below in Table O1-4. Five narrow seasonal streams will be temporarily impacted by trenching and placing conduits. One seasonal stream will be crossed by construction cranes using construction mats or rock. Temporary impacts are eligible to be authorized with the Temporary Impacts to Wetlands and Waterways General Authorization. Once authorized, the General Authorization is valid for 3 years or until the project is complete, whichever occurs first.

Table O1-4. Volume of Removal and Fill

Feature ID	Stream Length (ft)	Stream Width (ft)	Removal Volume (cy)	Fill Volume (cy)	Fill Material	Figure #
Temporary Impacts						
OW115	50	5	28	28	Existing Native Material and Conduit (2 crossing locations)	O1-3.1

Feature ID	Stream Length (ft)	Stream Width (ft)	Removal Volume (cy)	Fill Volume (cy)	Fill Material	Figure #
OW248	50	3	-	6	Construction Mats or Rock on Geotextile Fabric	01-3.2
OW239	50	1	6	6	Existing Native Material and Conduit	01-3.3
OW227	50	1	6	6	Existing Native Material and Conduit	01-3.4
OW310	50	2	11	11	Existing Native Material and Conduit	01-3.5
Totals			51	57		

4.0 Mitigation and Monitoring for Waters of the State – OAR 345-022-0160(1)(a)(F)

(F) A description of proposed actions to mitigate adverse impacts to the features identified in (A) and the applicant's proposed monitoring program, if any, for such impacts.

ODSL does not require mitigation for temporary impacts. The re-establishment of preconstruction contours and planting to revegetate temporarily disturbed areas must be completed within 12 months of initial impacts or before the expiration of the General Authorization, whichever comes first. A Rectification Monitoring Report must be completed and submitted to ODSL within 90 days of the temporary impact rectification.

5.0 References

- Adamus, P.R. 2001. Guidebook for Hydrogeomorphic (HGM)-based Assessment of Oregon Wetland and Riparian Sites: Statewide Classification and Profiles. Oregon Division of State Lands, Salem, OR.
- Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Fish and Wildlife Service, Washington, DC. FWS/OBS-79/31.
- DOGAMI (Oregon Department of Geology and Mineral Industries). 2025. DOGAMI Lidar Viewer. <https://gis.dogami.oregon.gov/maps/lidarviewer/>.
- Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1. U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS.

ODSL (Oregon Department of State Lands). 2025. Statewide Wetland Inventory.

<https://maps.dsl.state.or.us/swi/>

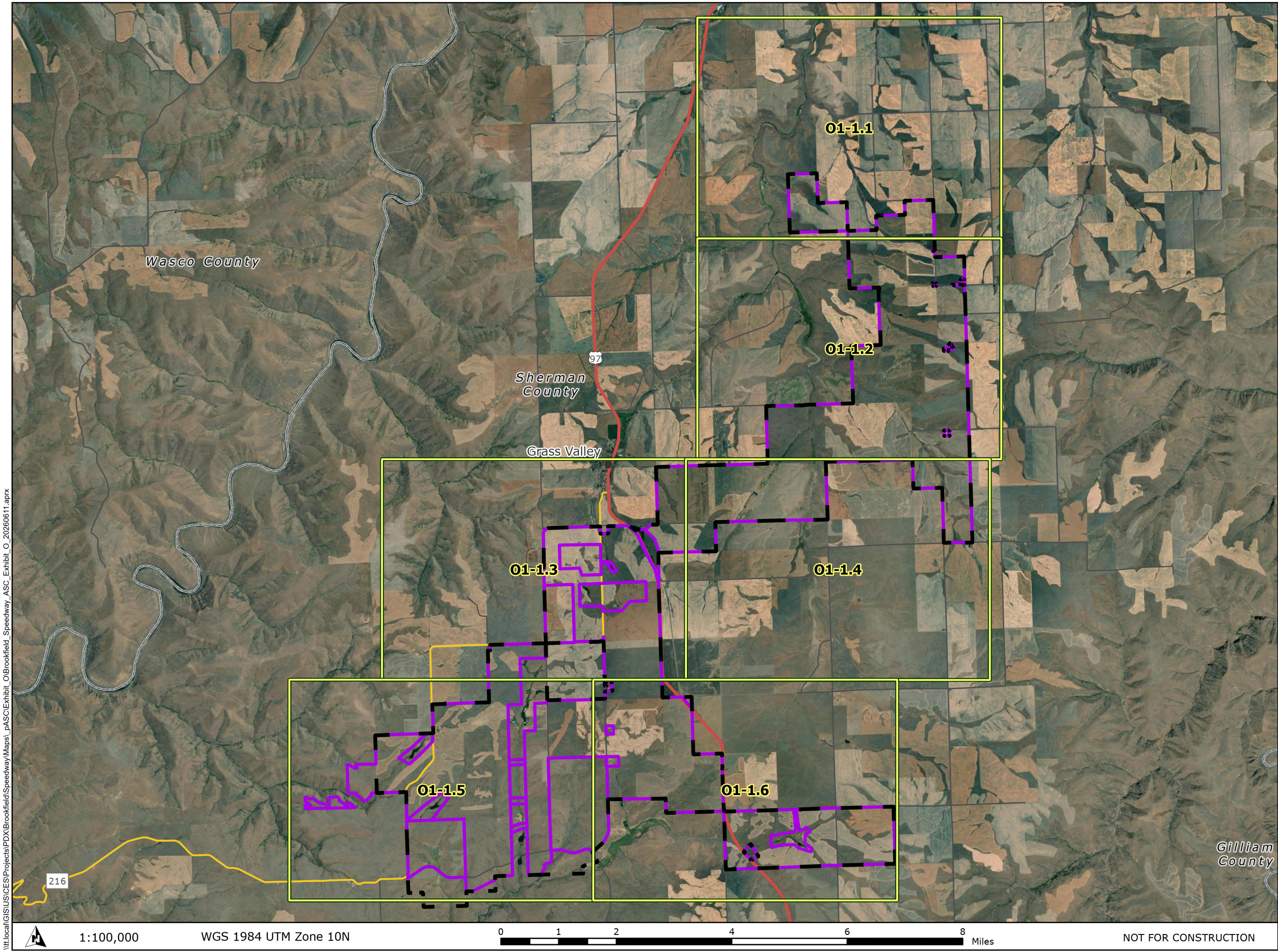
USACE (U.S. Army Corps of Engineers). 2008. Regional supplement to the Corps of Engineers Wetland Delineation Manual: Arid West (Version 2.0). ed. J.S. Wakeley, R.W. Lichvar, and C.V. Noble. ERDC/EL TR-08-28. Vicksburg, MS: U.S. Army Engineer Research and Development Center.

6.0 Approval Standards and Submittal Requirements

Table O1-5. Approval Standards and Submittal Requirements Matrix

Requirements	Location
OAR 345-022-0160 State and Local Laws and Regulations	–
Submittal Requirements	
To assist the Council in determining compliance with all state and local laws and regulations applicable to EFSC and the siting process, submit the following, as directed by the project order described in OAR 345-015-0160:	–
(1) Regarding Water (a) Information based on literature and field study, as appropriate, about waters of this state, as defined under ORS 196.800, including: (A) A description of all areas within the site boundary that might be waters of this state and a map showing the location of these features;	Section 2.0
(B) An analysis of whether construction or operation of the proposed facility would adversely affect any waters of this state;	Section 3.0
(C) A description of the significance of potential adverse impacts to each feature identified in (A), including the nature and amount of material the applicant would remove from or place in the waters analyzed in (B);	Section 3.1
(D) If the proposed facility would not need a removal-fill authorization, an explanation of why no such authorization is required for the construction and operation of the proposed facility;	–
(E) If the proposed facility would need a removal-fill authorization, information to support a determination by the Council that the Oregon Department of State Lands should issue a removal-fill permit, including information in the form required by the Department of State Lands under OAR Chapter 141 Division 85; and	Section 3.2
(F) A description of proposed actions to mitigate adverse impacts to the features identified in (A) and the applicant's proposed monitoring program, if any, for such impacts.	Section 4.0
EFSC 2-2025, adopt filed 04/02/2025, effective 04/02/2025	

Figures



**Speedway
Energy Facility**

**Figure O1-1
Overview Map-
NWI/NHD**

SHERMAN COUNTY, OR

- Map Grid
- Facility Site Boundary
- Wetland Survey Area
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads

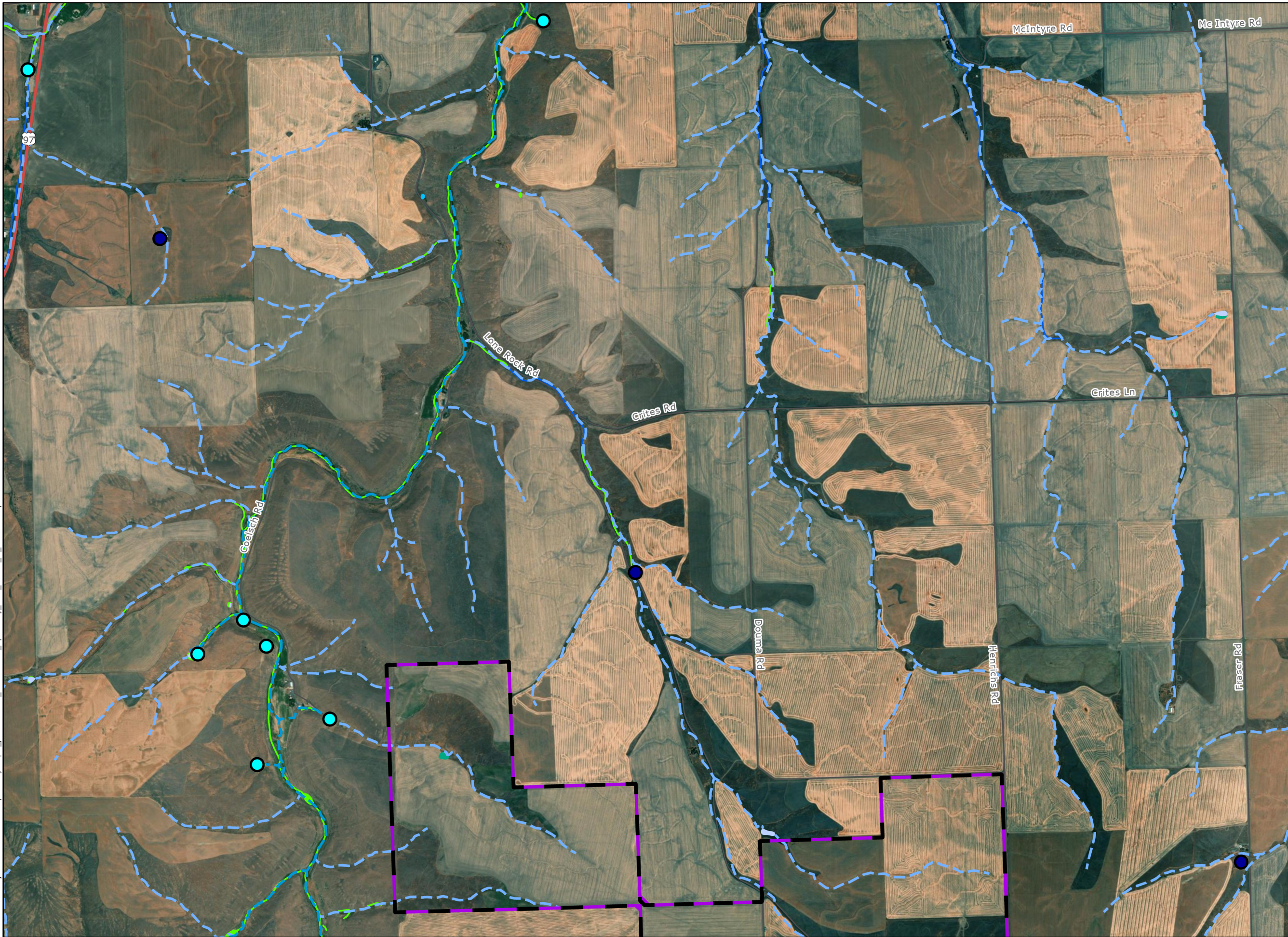


Reference Map



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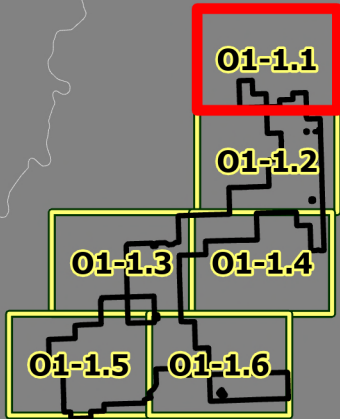
**Figure O1-1.1
Overview Map-
NWI/NHD**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- US Highway
- Local Roads
- Wetlands and Waters
 - Spring/Seep (NHD)
 - Well (NHD)
 - Intermittent Stream (NHD)
 - Perennial Stream (NHD)
 - Lake/Pond (NHD)
 - Freshwater Emergent Wetland (NW1)
 - Freshwater Forested/Shrub Wetland (NW1)
 - Freshwater Pond (NW1)
 - Riverine (NW1)



Reference Map



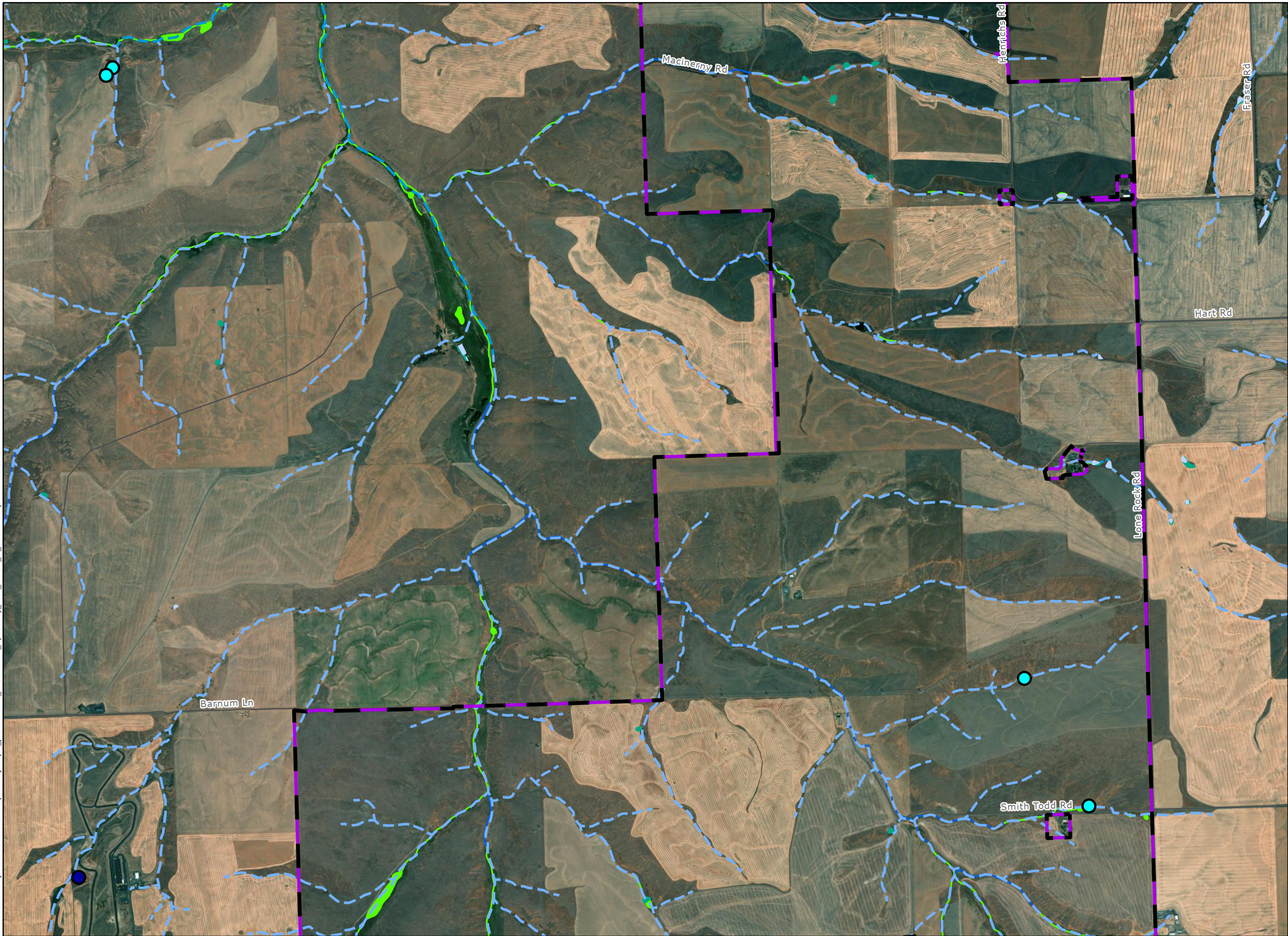
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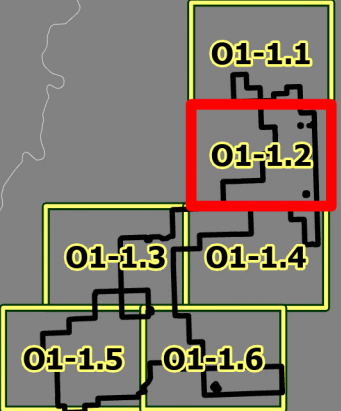
**Figure O1-1.2
Overview Map-
NWI/NHD**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- Local Roads
- Wetlands and Waters
 - Spring/Seep (NHD)
 - Well (NHD)
 - Intermittent Stream (NHD)
 - Perennial Stream (NHD)
 - Lake/Pond (NHD)
 - Freshwater Emergent Wetland (NWI)
 - Freshwater Forested/Shrub Wetland (NWI)
 - Freshwater Pond (NWI)
 - Riverine (NWI)

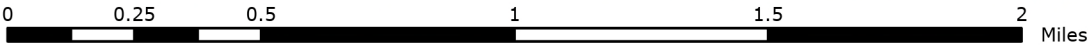


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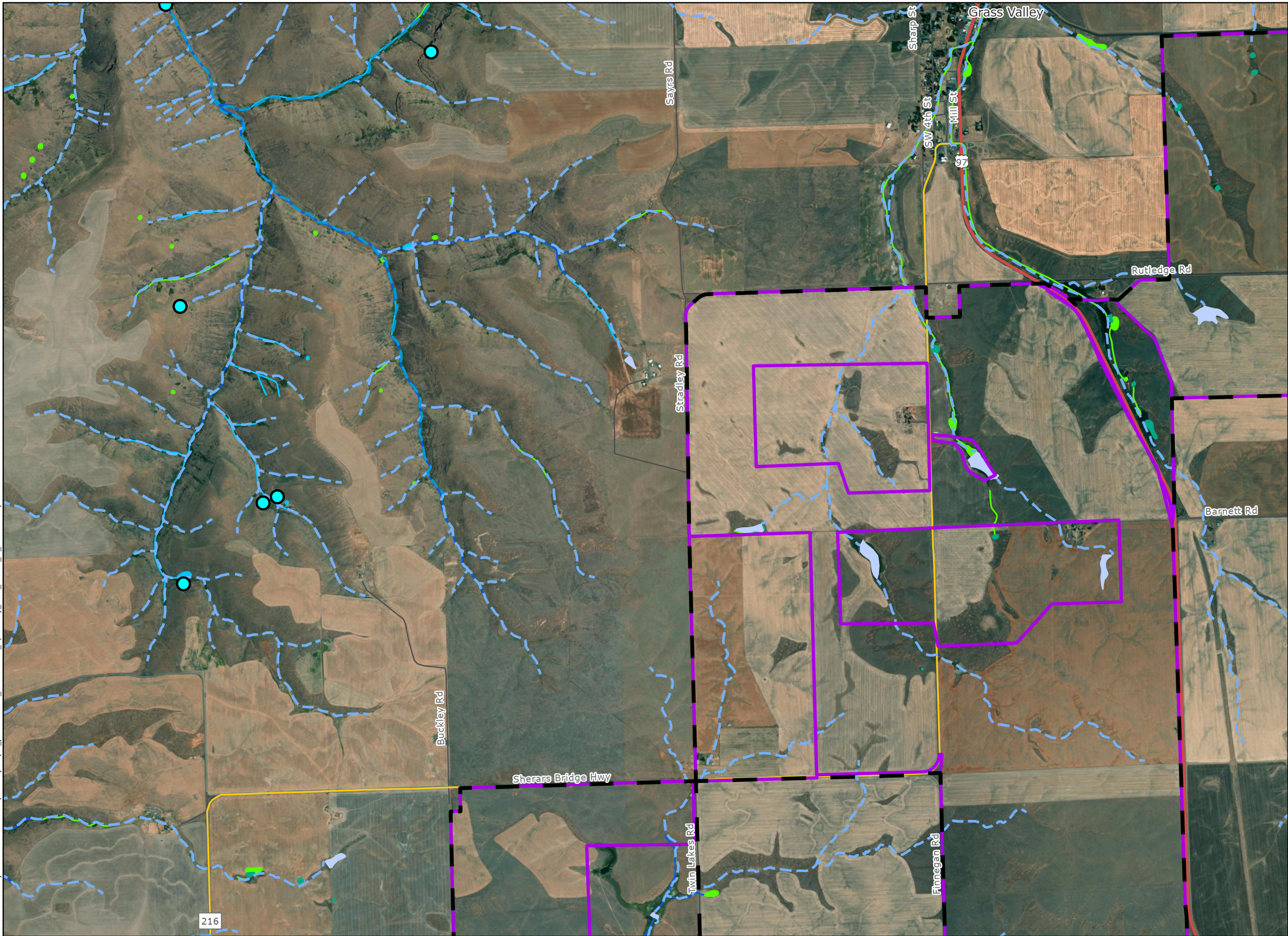
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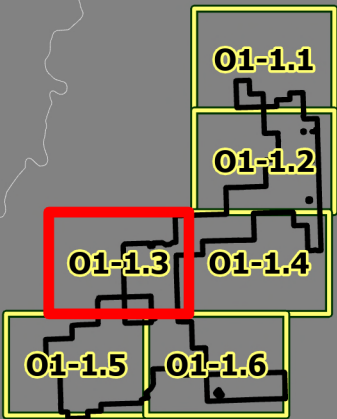
**Figure O1-1.3
Overview Map-
NWI/NHD**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- US Highway
- State Highway
- Local Roads
- City/Town
- Wetlands and Waters
 - Spring/Seep (NHD)
 - Well (NHD)
 - Intermittent Stream (NHD)
 - Perennial Stream (NHD)
 - Lake/Pond (NHD)
 - Freshwater Emergent Wetland (NWI)
 - Freshwater Forested/Shrub Wetland (NWI)
 - Freshwater Pond (NWI)
 - Riverine (NWI)

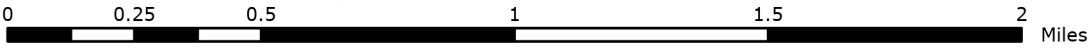


Reference Map



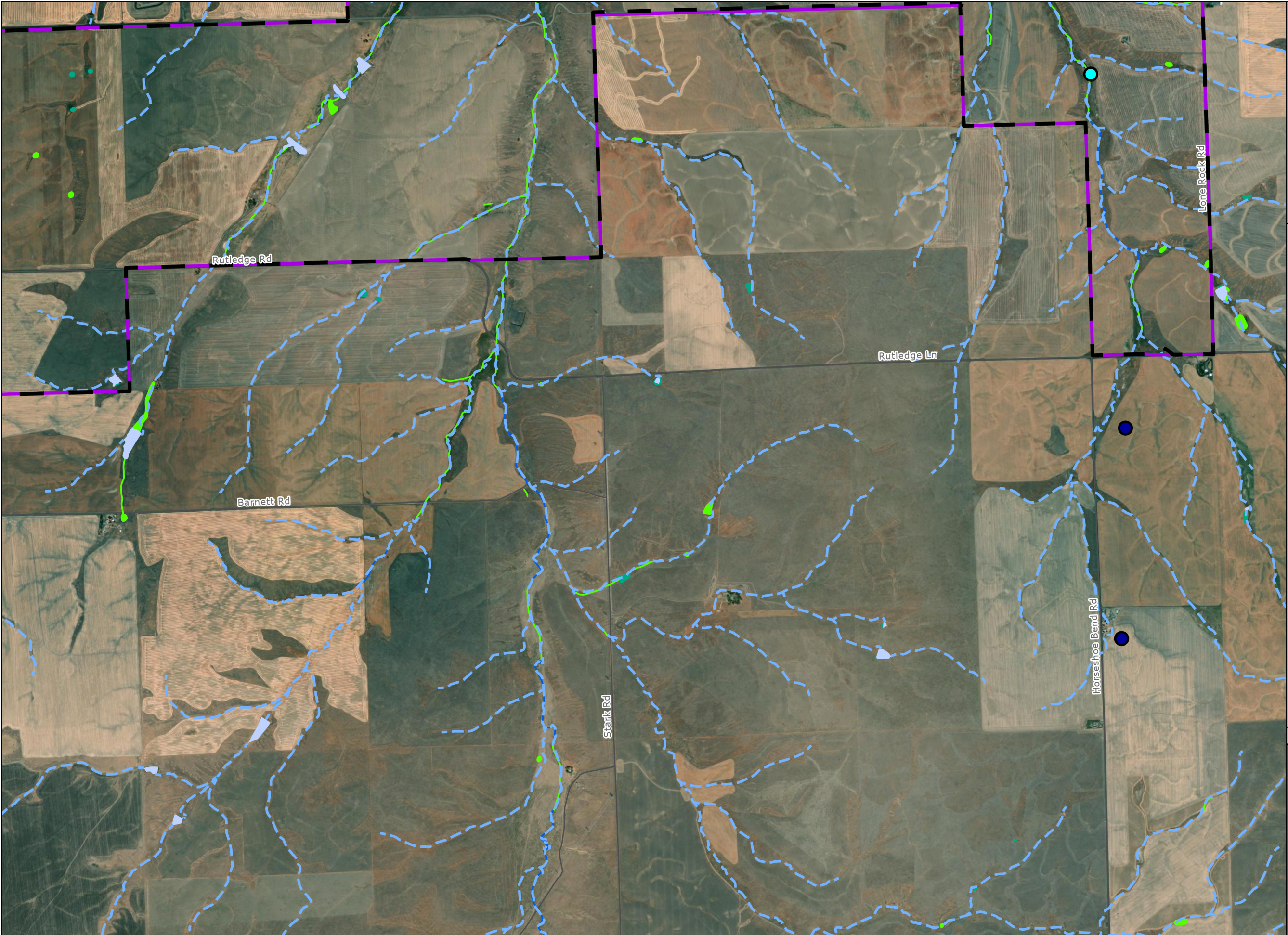
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Speedway Energy Facility

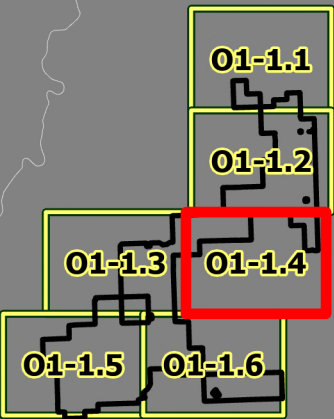
**Figure O1-1.4
Overview Map-
NWI/NHD**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- Local Roads
- Wetlands and Waters
 - Spring/Seep (NHD)
 - Well (NHD)
 - Intermittent Stream (NHD)
 - Perennial Stream (NHD)
 - Lake/Pond (NHD)
 - Freshwater Emergent Wetland (NWI)
 - Freshwater Forested/Shrub Wetland (NWI)
 - Freshwater Pond (NWI)
 - Riverine (NWI)

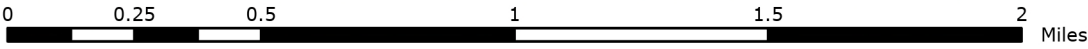


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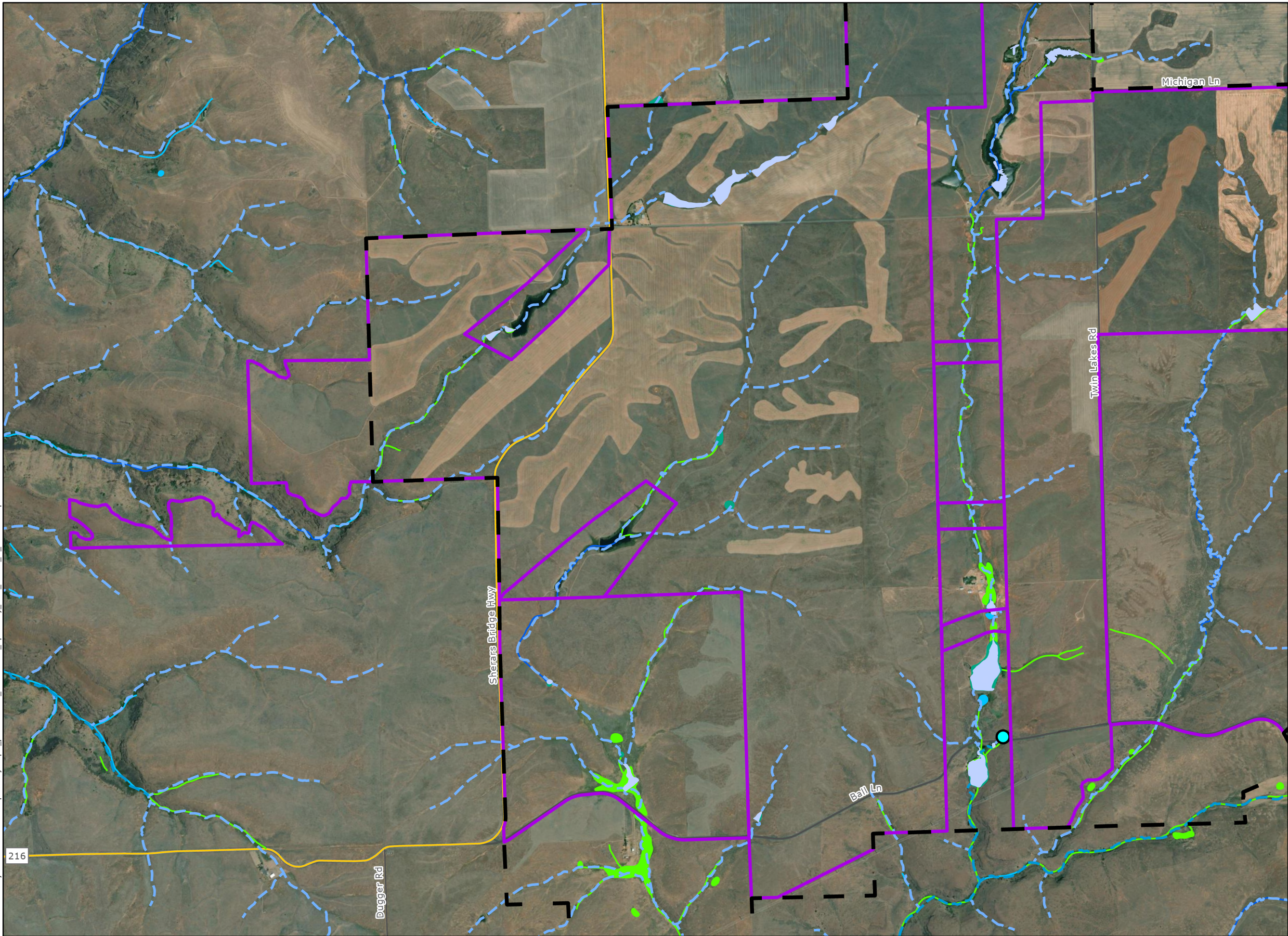
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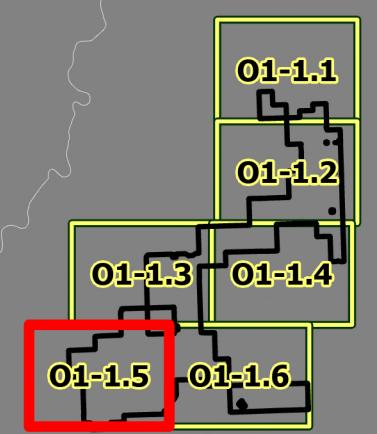
**Figure O1-1.5
Overview Map-
NWI/NHD**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- State Highway
- Local Roads
- Wetlands and Waters
 - Spring/Seep (NHD)
 - Well (NHD)
 - Intermittent Stream (NHD)
 - Perennial Stream (NHD)
 - Lake/Pond (NHD)
 - Freshwater Emergent Wetland (NWI)
 - Freshwater Forested/Shrub Wetland (NWI)
 - Freshwater Pond (NWI)
 - Riverine (NWI)

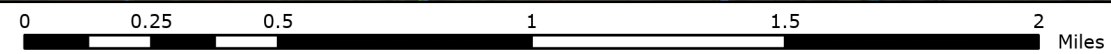


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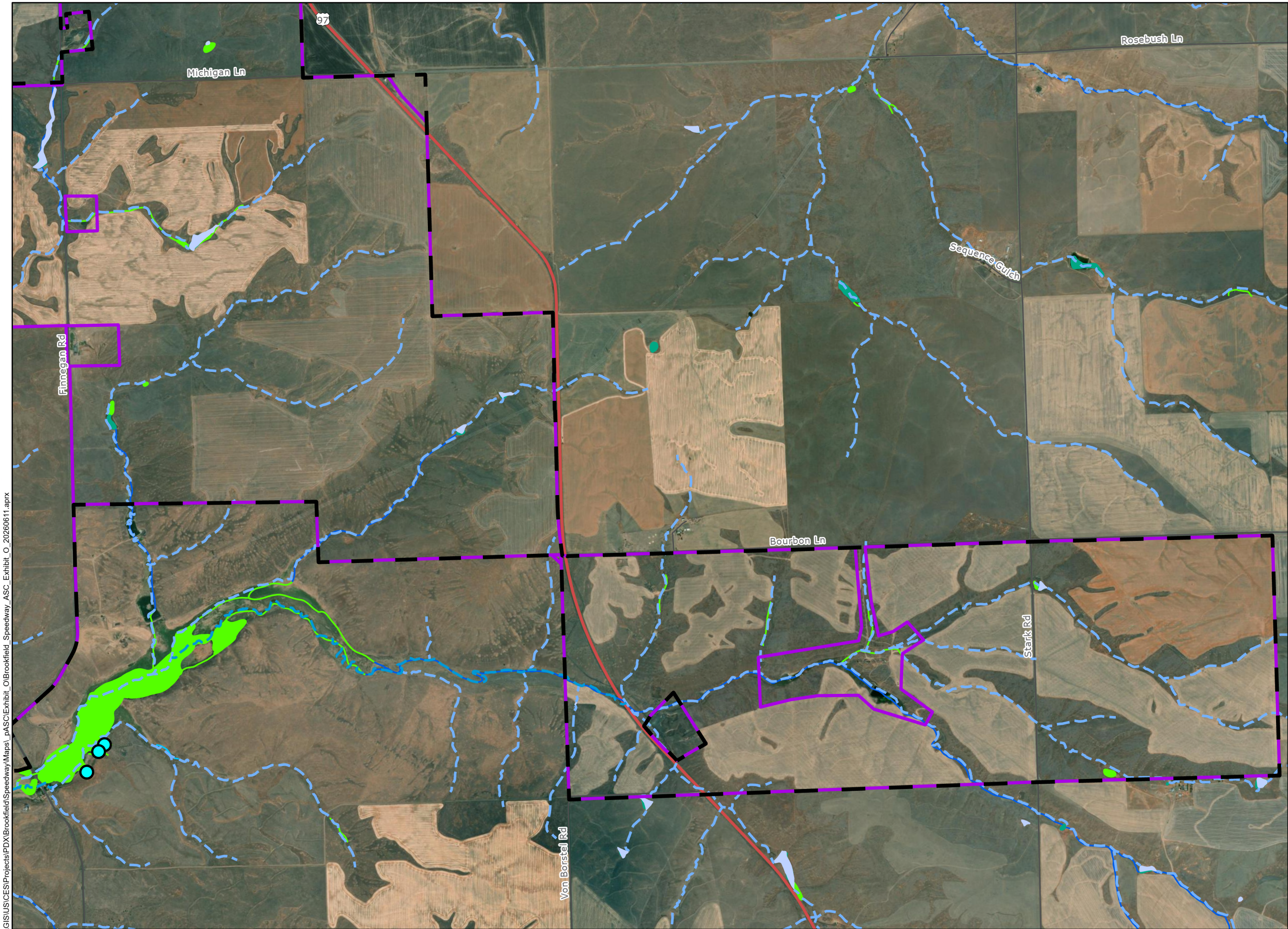


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Speedway Energy Facility

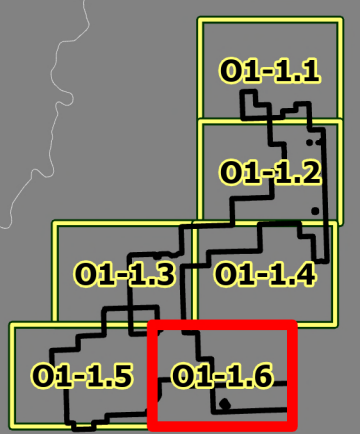
**Figure O1-1.6
Overview Map-
NWI/NHD**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- US Highway
- Local Roads
- Wetlands and Waters**
 - Spring/Seep (NHD)
 - Well (NHD)
 - Intermittent Stream (NHD)
 - Perennial Stream (NHD)
 - Lake/Pond (NHD)
 - Freshwater Emergent Wetland (NWI)
 - Freshwater Forested/Shrub Wetland (NWI)
 - Freshwater Pond (NWI)
 - Riverine (NWI)

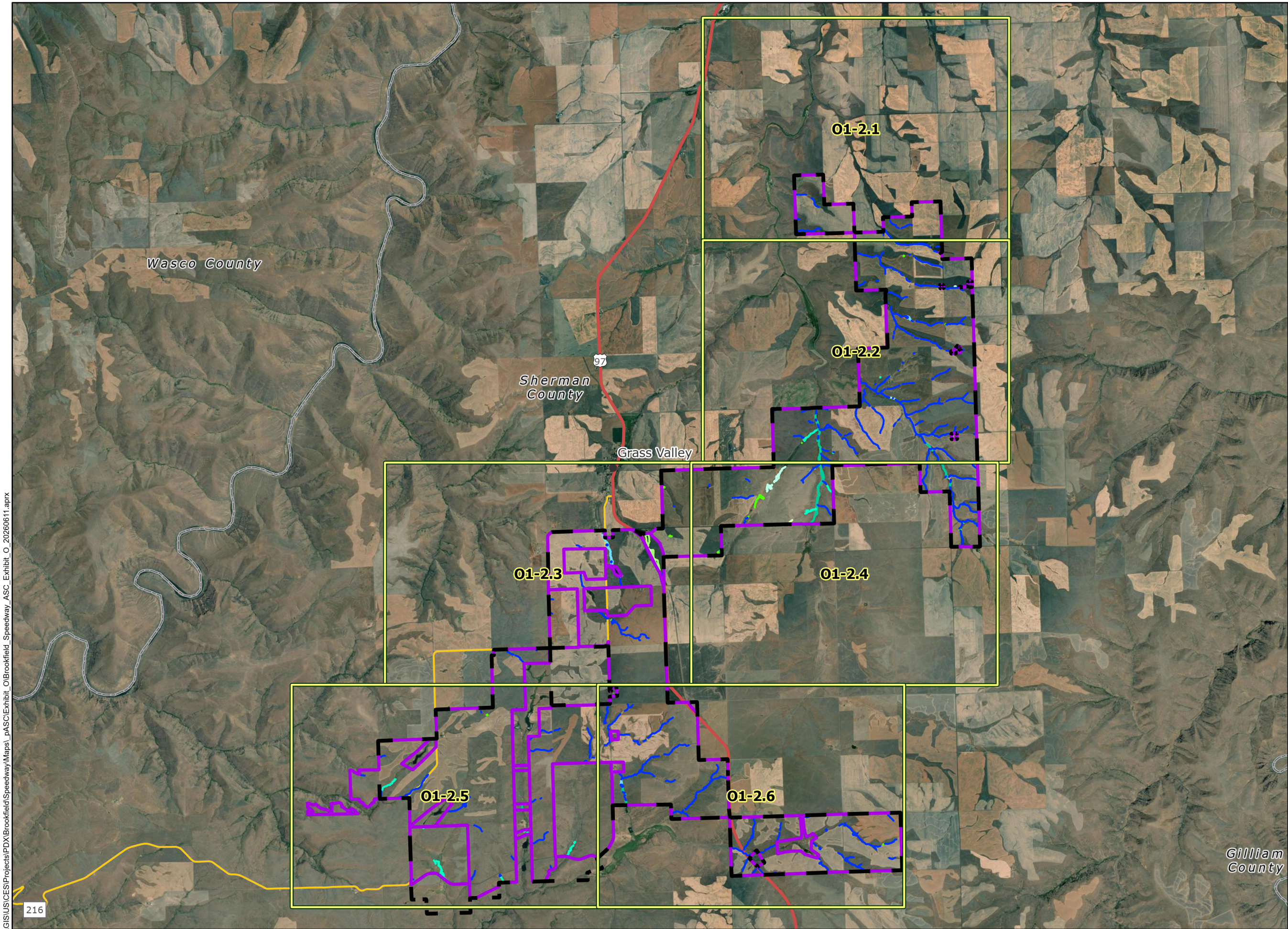


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Speedway Energy Facility

**Figure 01-2
Delineated Wetlands
and Waters**

SHERMAN COUNTY, OR

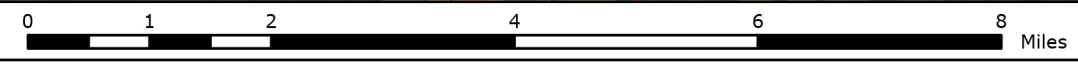
- Map Grid
 - Facility Site Boundary
 - Wetland Survey Area
 - City/Town
 - County Boundary
 - US Highway
 - State Highway
 - Other Waters (OHWL)
 - Cowardin, HGM Subclass
 - PEM; Depressional Closed Nonpermanent
 - PEM; Depressional Closed Permanent
 - PEM; Slope Headwater
 - PEM; Flats
 - PEM; Riverine Flow-through
 - PEM; Riverine Impounding
 - PEM; Slope Headwater
 - PEM; Slope Valley
 - PSS; Riverine Flow-through
 - PSS; Slope Valley
- TETRA TECH** **Speedway Energy**

Reference Map



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Speedway Energy Facility

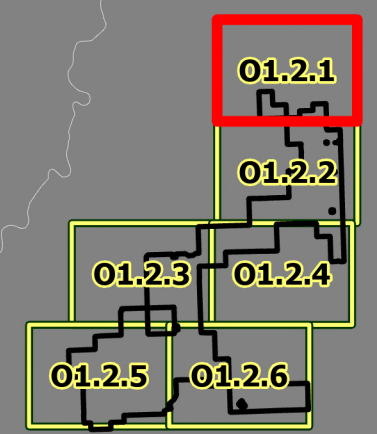
**Figure O1-2.1
Delineated Wetlands
and Waters**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- US Highway
- Local Roads
- Other Waters (OHWL)

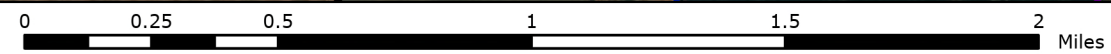


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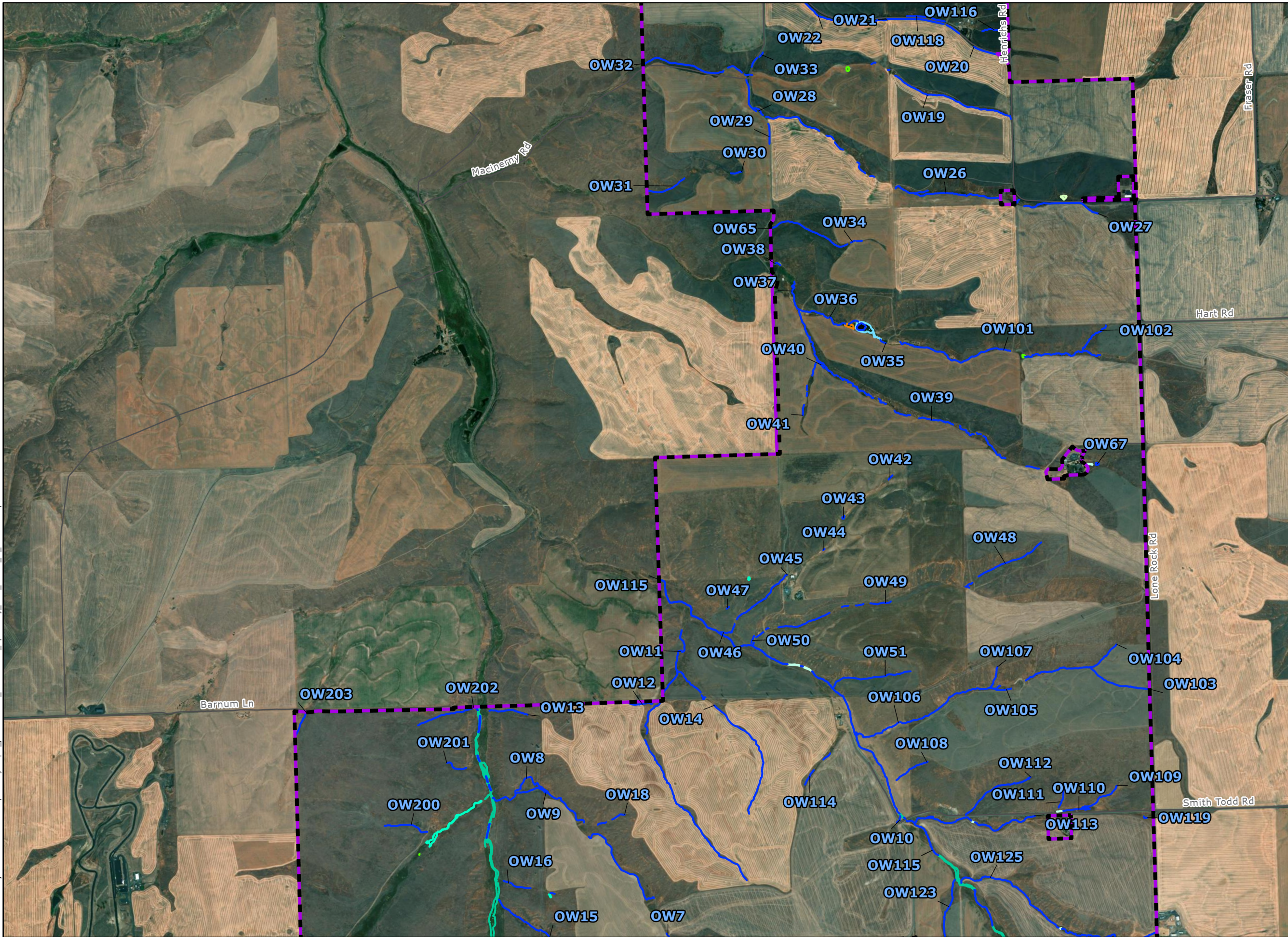
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Speedway Energy Facility

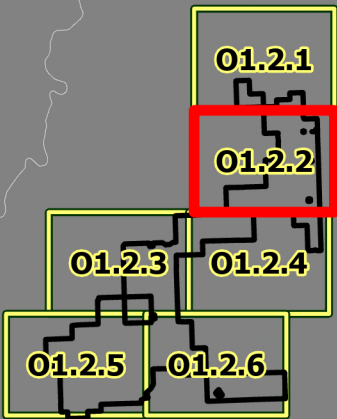
**Figure O1-2.2
Delineated Wetlands
and Waters**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- Local Roads
- Other Waters (OHWL)
- Cowardin, HGM Subclass
 - PEM; Depressional Closed Nonpermanent
 - PEM; Flats
 - PEM; Riverine Flow-through
 - PEM; Riverine Impounding
 - PEM; Slope Headwater
 - PEM; Slope Valley
 - PSS; Slope Valley



Reference Map



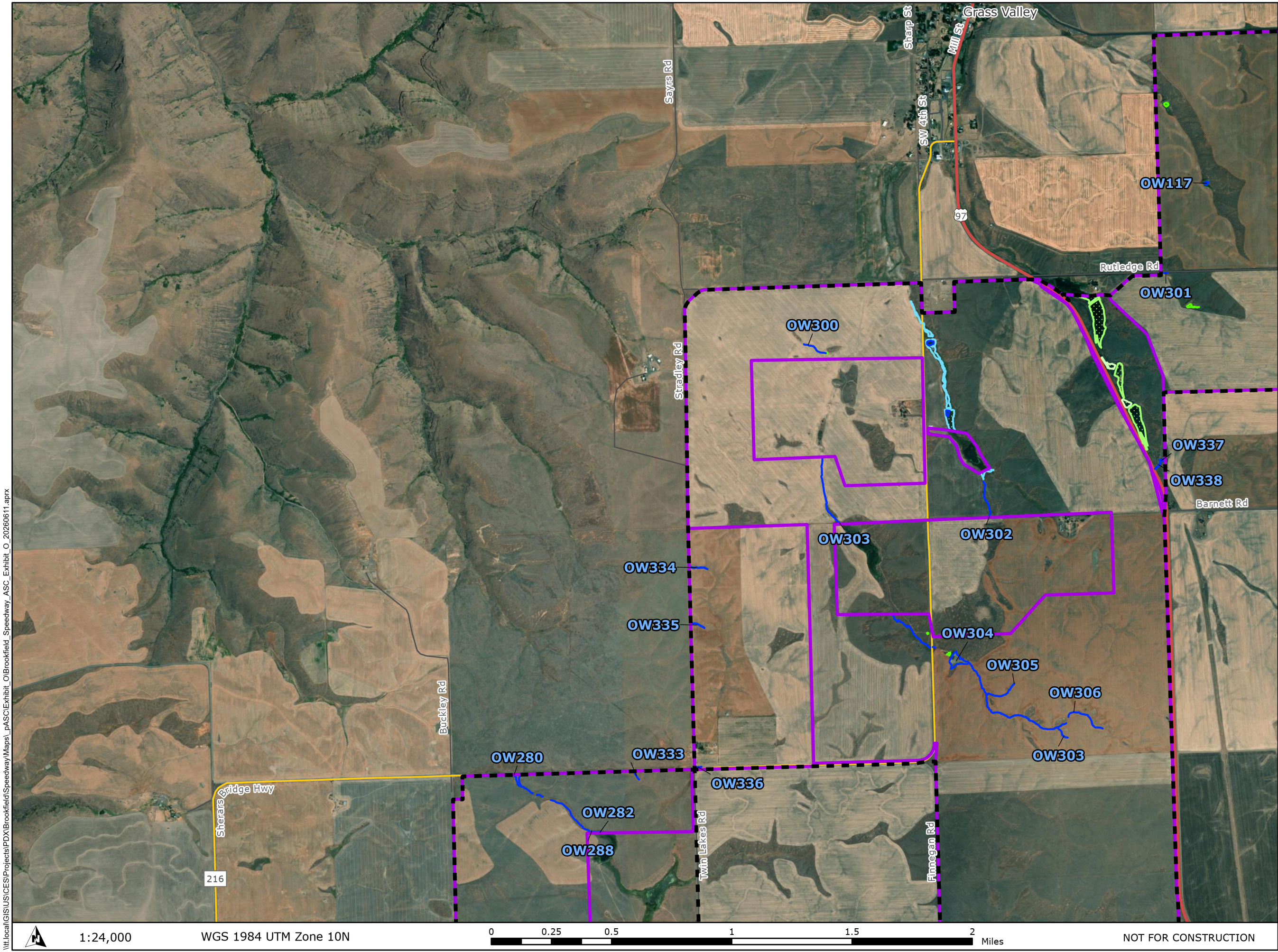
1:24,000

WGS 1984 UTM Zone 10N

0 0.25 0.5 1 1.5 2 Miles

NOT FOR CONSTRUCTION

\\tt.local\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\Maps\pASC\Exhibit_O\Brookfield_Speedway_ASC_Exhibit_O_20260611.aprx



Speedway Energy Facility

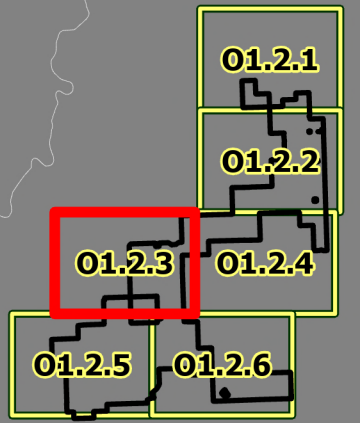
**Figure O1-2.3
Delineated Wetlands
and Waters**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- City/Town
- US Highway
- State Highway
- Local Roads
- Other Waters (OHWL)
- Cowardin, HGM Subclass
 - PEM; Depressional Closed Nonpermanent
 - PEM; Depressional Closed Permanent
 - PEM; Flats
 - PEM; Riverine Impounding

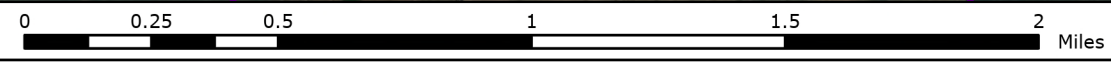


Reference Map



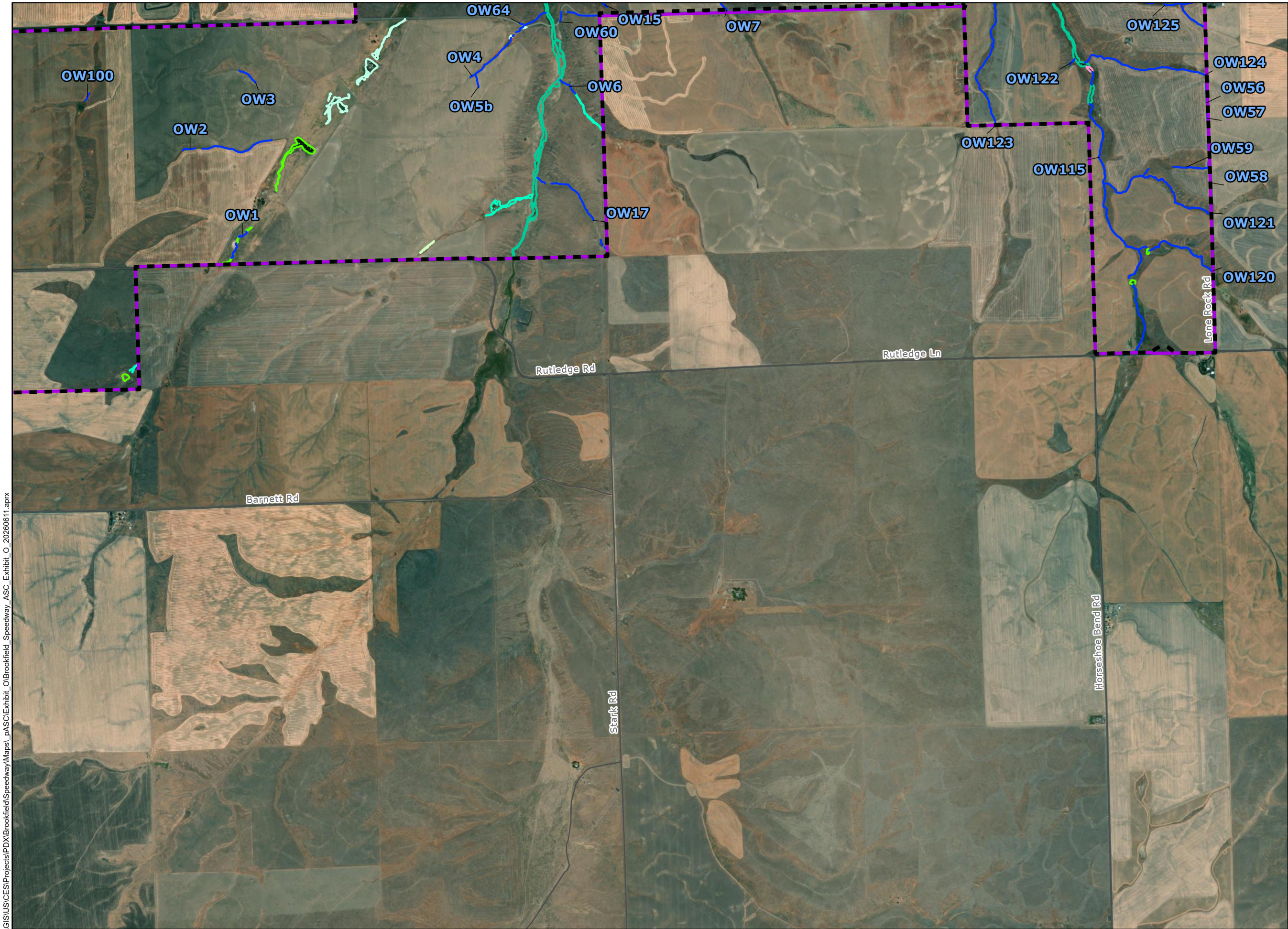
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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

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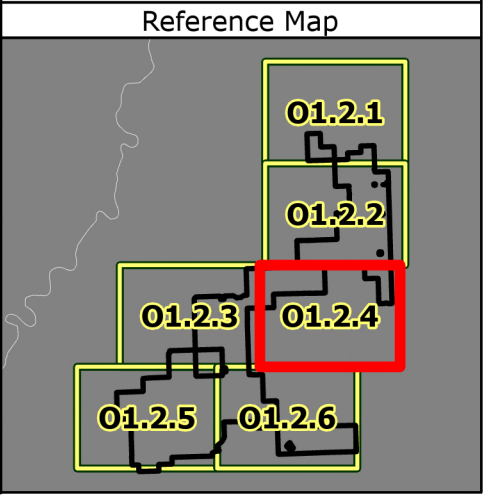


Speedway Energy Facility

Figure O1-2.4 Delineated Wetlands and Waters

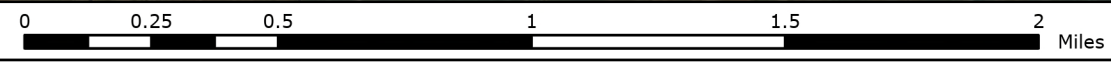
SHERMAN COUNTY, OR

- Facility Site Boundary
 - Wetland Survey Area
 - Local Roads
 - Other Waters (OHWL)
 - Cowardin, HGM Subclass
 - PEM; Depressional Closed Nonpermanent
 - PEM; Flats
 - PEM; Riverine Flow-through
 - PEM; Slope Headwater
 - PEM; Slope Valley
 - PSS; Riverine Flow-through
- TETRA TECH
Speedway Energy



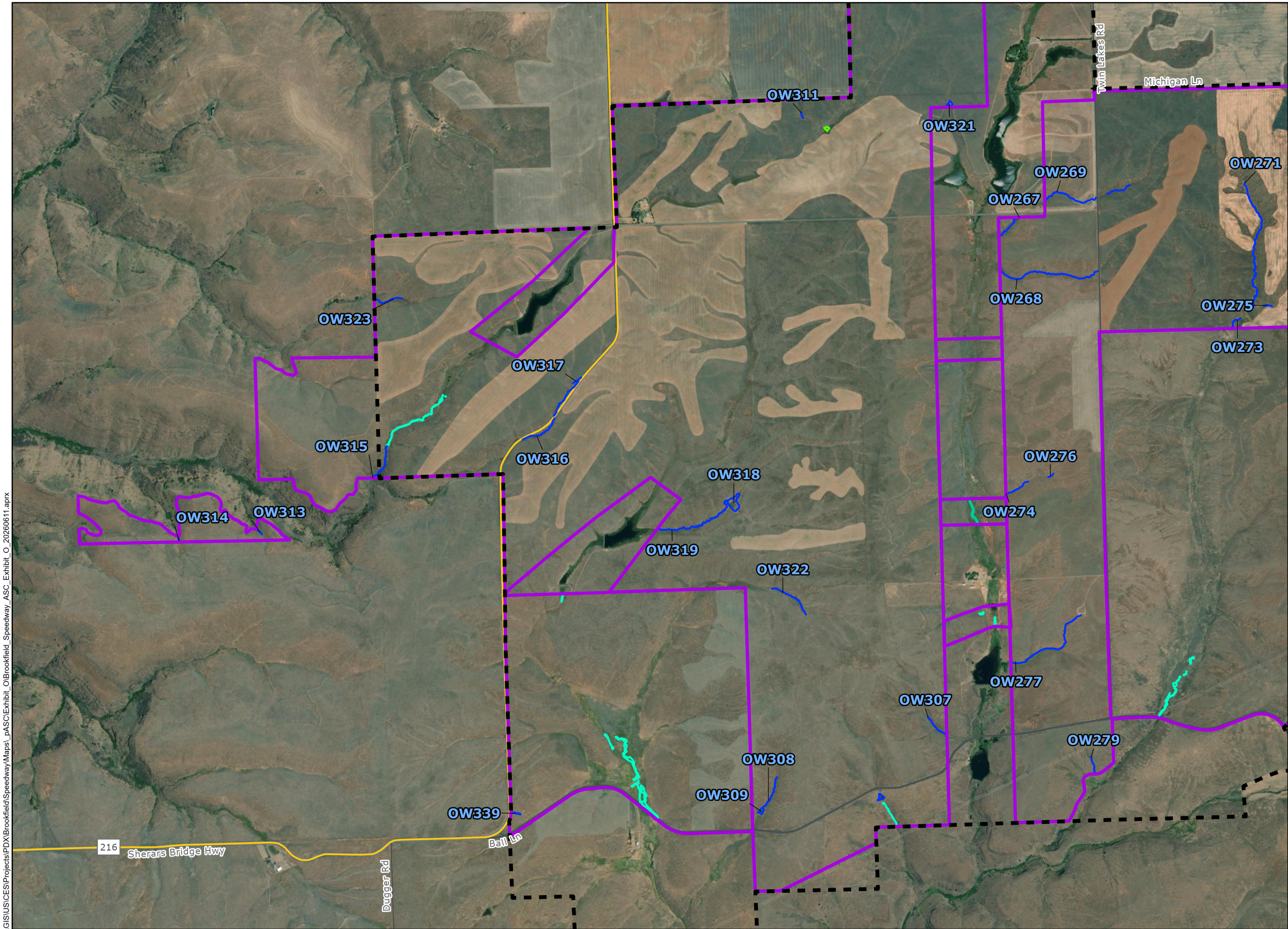
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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

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Speedway Energy Facility

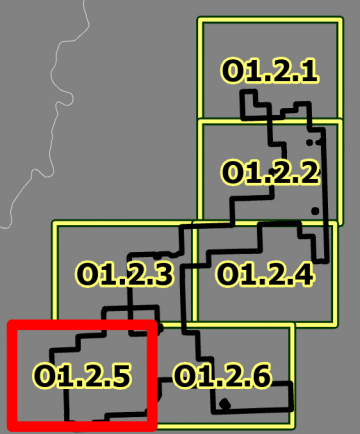
**Figure O1-2.5
Delineated Wetlands
and Waters**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- State Highway
- Local Roads
- Other Waters (OHWL)
- Cowardin, HGM Subclass
 - PEM; Slope Headwater
 - PEM; Flats
 - PEM; Riverine Flow-through
 - PEM; Slope Headwater

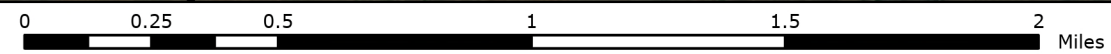


Reference Map

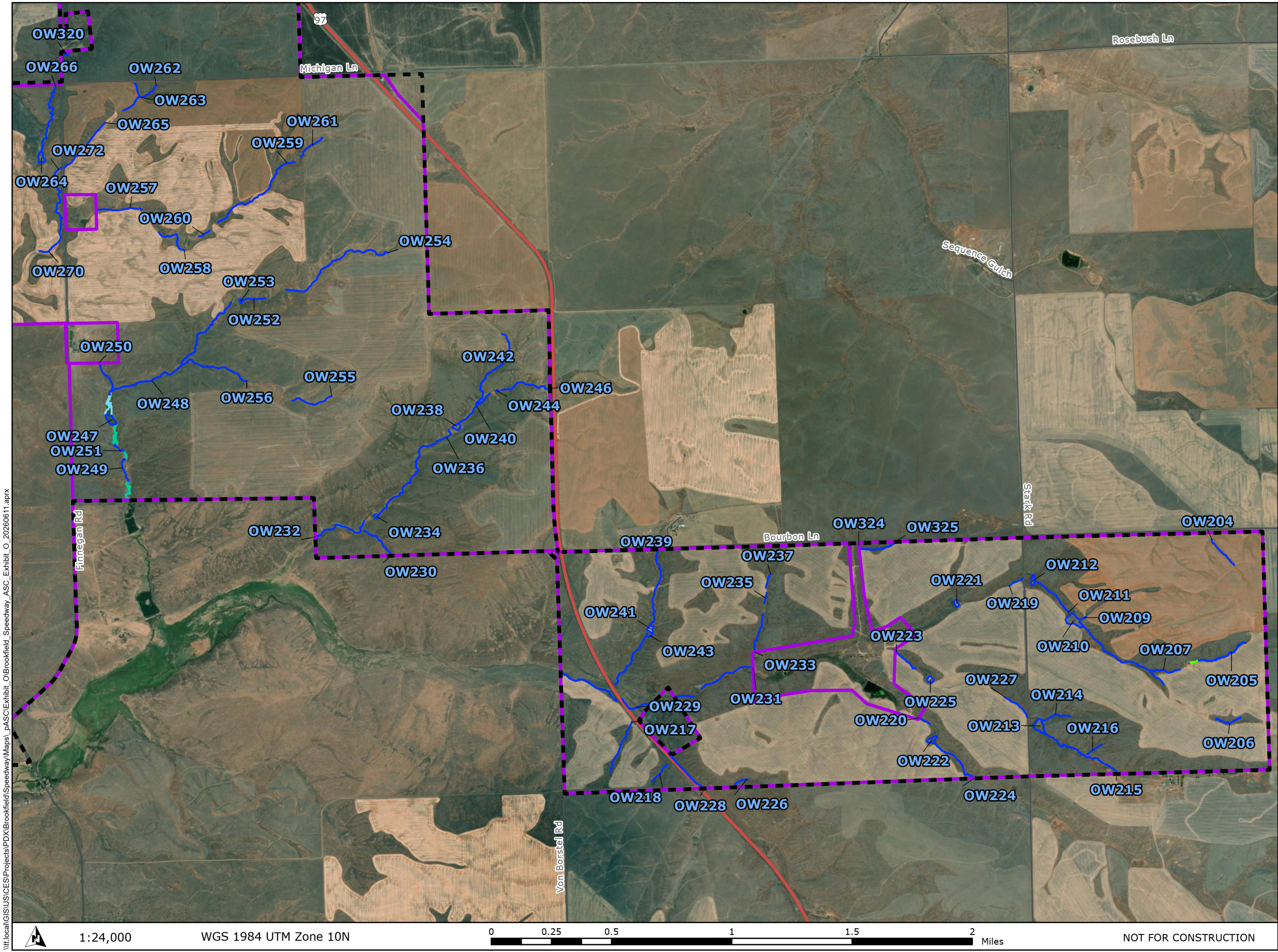


1:24,000

WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION



Speedway Energy Facility

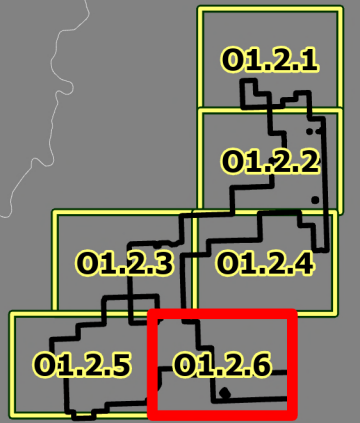
Figure O1-2.6
Delineated Wetlands
and Waters

SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- US Highway
- Local Roads
- Other Waters (OHWL)
- Cowardin, HGM Subclass
 - PEM; Flats
 - PEM; Riverine Flow-through
 - PEM; Riverine Impounding



Reference Map

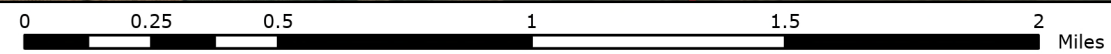


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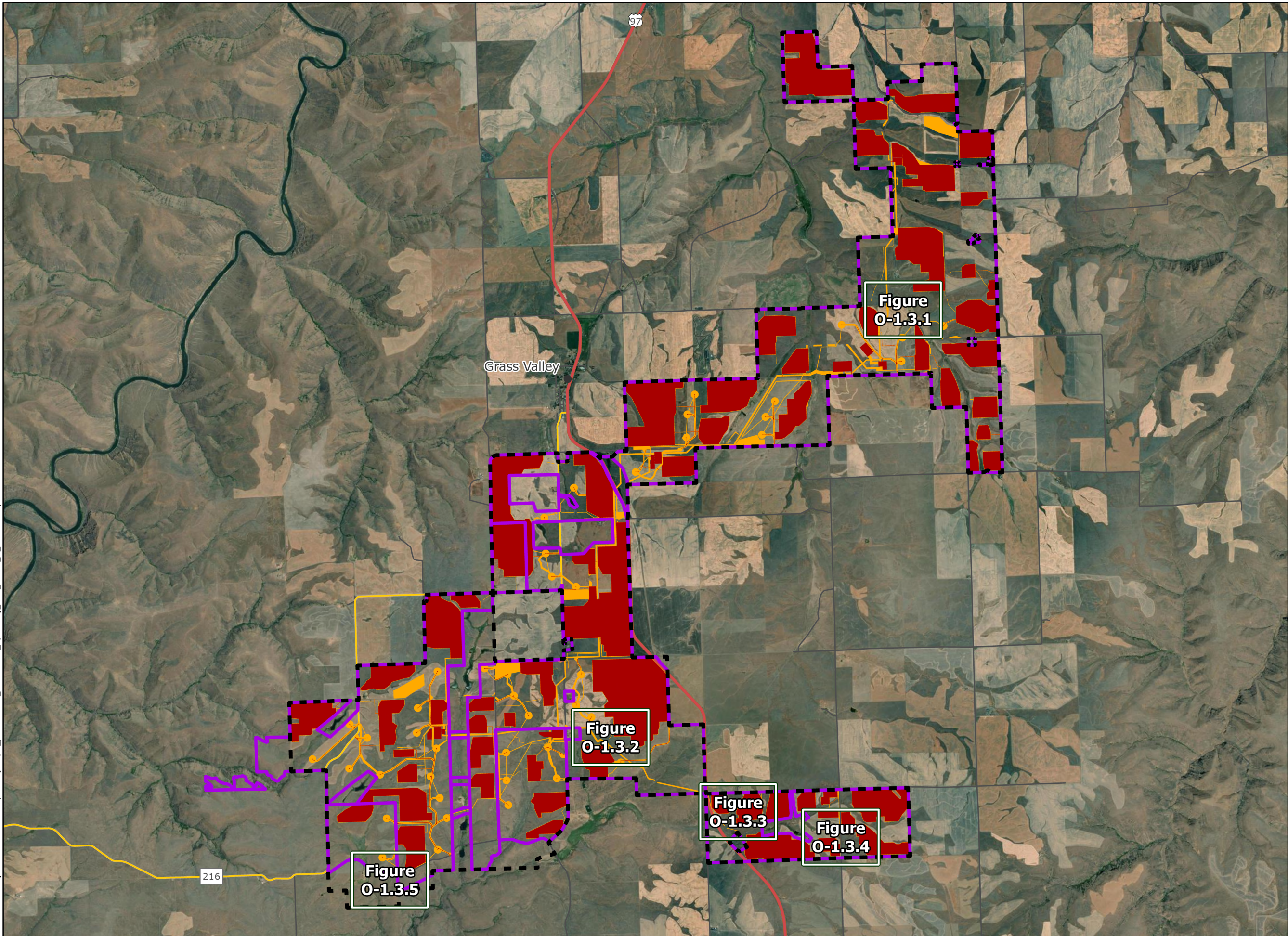
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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

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**Speedway
Energy Facility**

**Figure O-1.3
Site Plan with
Five Temporary
Impact Locations**

SHERMAN COUNTY, OR

- Facility Site Boundary
 - Wetland Survey Area
 - Detailed Grid Index
 - City/Town
 - US Highway
 - State Highway
 - Local Roads
- Impact Type
- Permanent Impact
 - Temporary Impact



Reference Map



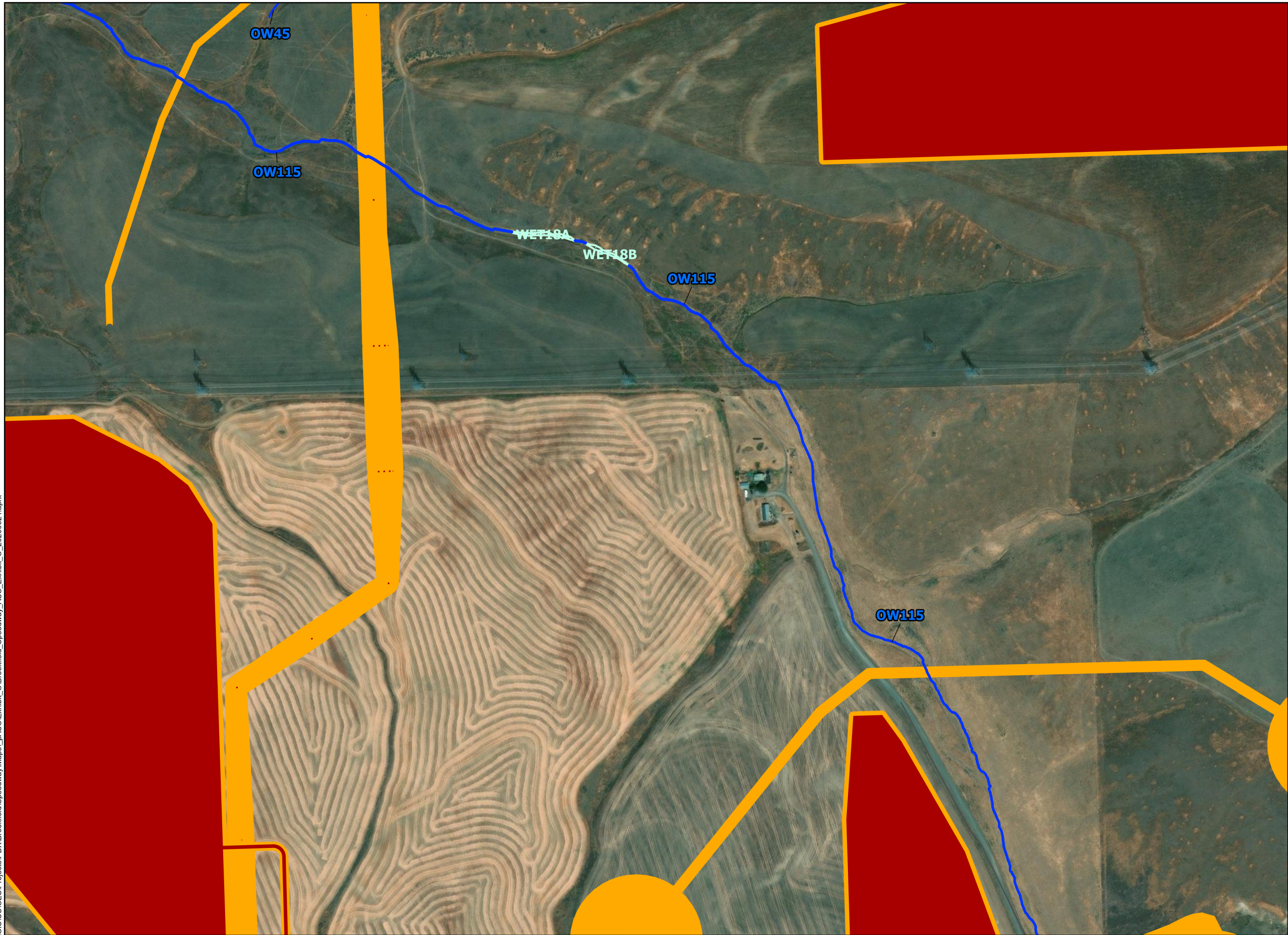
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WGS 1984 UTM Zone 10N

0 0.75 1.5 3 4.5 6 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

**Figure O-1.3.1
Site Plan with
Five Temporary
Impact Locations**

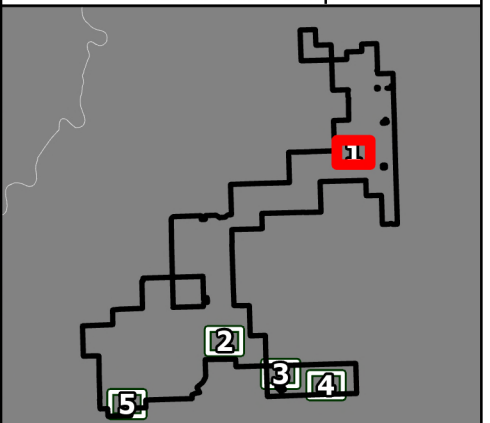
SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- City/Town
- Local Roads
- Other Waters (OHWL)*
- Potentially State Jurisdictional Field Delineated Wetlands (Cowardin; HGM Subclass)
- PEM; Slope Valley
- Impact Type
 - Permanent Impact
 - Temporary Impact

* Non-jurisdictional features excluded from figure set display

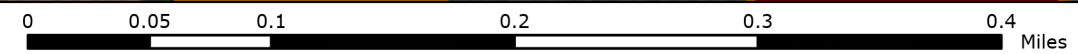


Reference Map



1:5,000

WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

Speedway Energy Facility

Figure O-1.3.2 Site Plan with Five Temporary Impact Locations

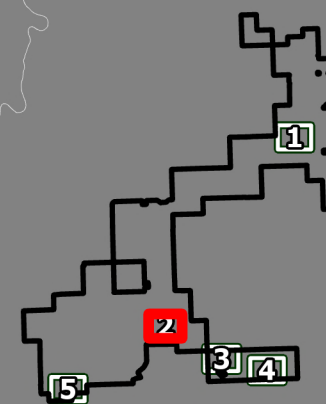
SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- City/Town
- Local Roads
- Other Waters (OHWL)*
- Potentially State Jurisdictional Field Delineated Wetlands (Cowardin; HGM Subclass)
 - PEM; Riverine Flow-through
 - PEM; Riverine Impounding
- Impact Type
 - Permanent Impact
 - Temporary Impact

* Non-jurisdictional features excluded from figure set display



Reference Map



\\t.local\GIS\US\CES\Projects\PDX\Brookfield\Speedway\ASC_Exhibit_O_20260624.aprx

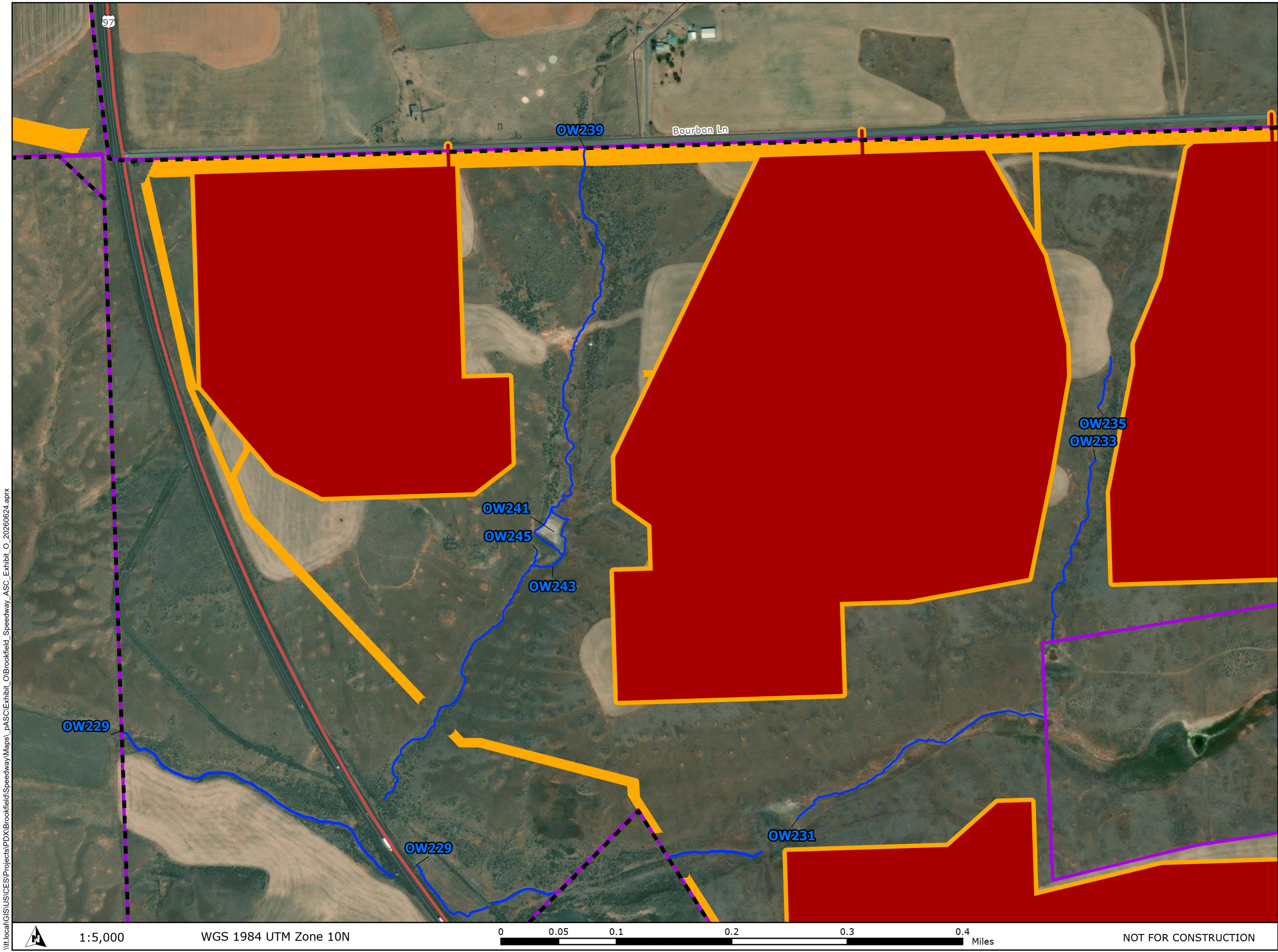


1:5,000

WGS 1984 UTM Zone 10N

0 0.05 0.1 0.2 0.3 0.4 Miles

NOT FOR CONSTRUCTION



Speedway Energy Facility

Figure O-1.3.3
Site Plan with
Five Temporary
Impact Locations

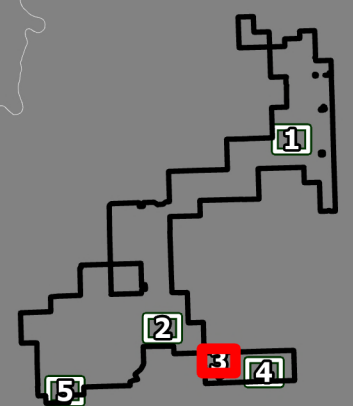
SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- City/Town
- US Highway
- Local Roads
- Other Waters (OHWL)*
- Impact Type
 - Permanent Impact
 - Temporary Impact

* Non-jurisdictional features
excluded from figure set
display



Reference Map



\\tt.local\GIS\US\Projects\PD\X\Brookfield\Speedway\Maps\pASC\Exhibit_O\Brookfield_Speedway_ASC_Exhibit_O_20260624.aprx



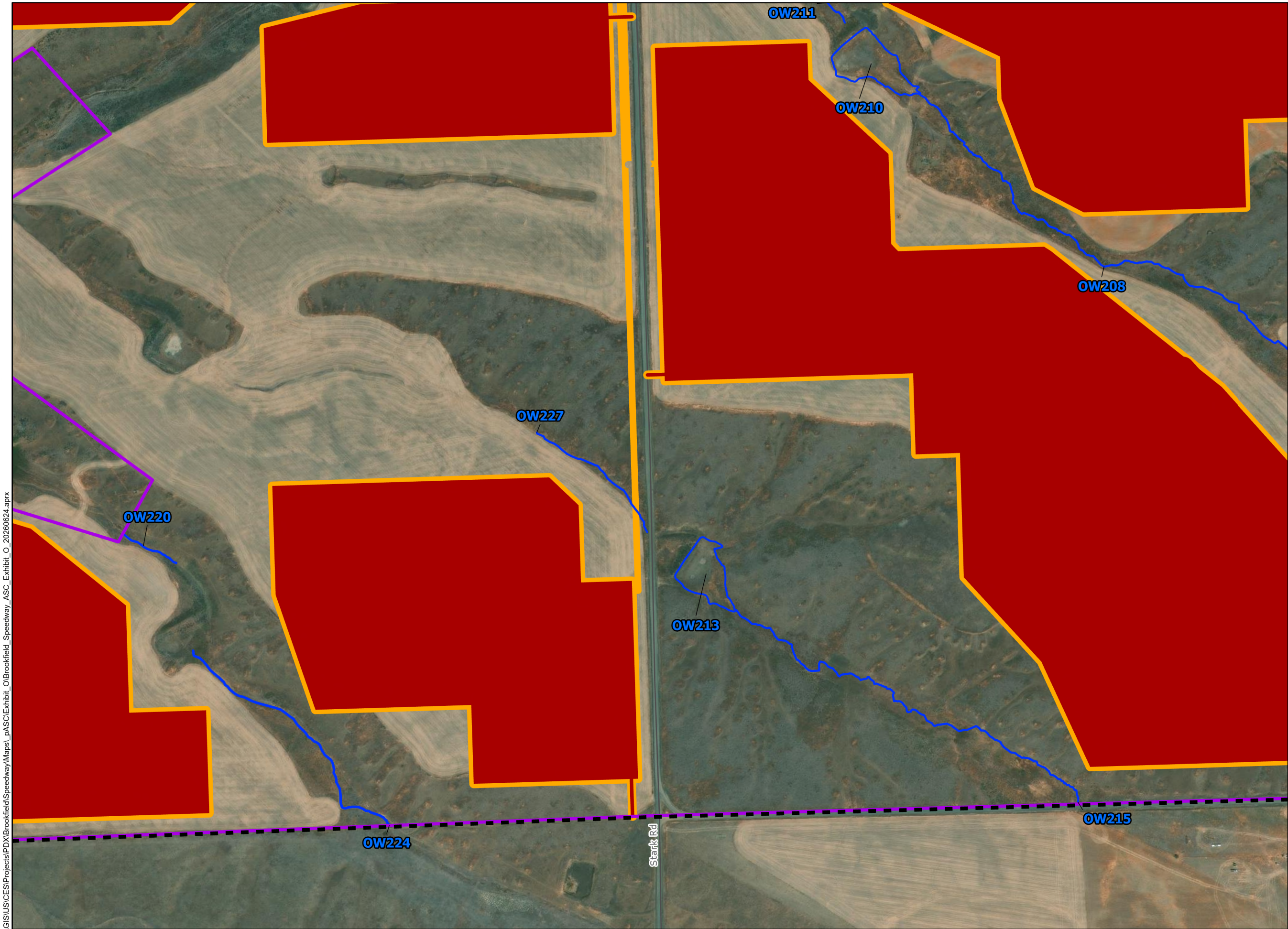
1:5,000

WGS 1984 UTM Zone 10N

0 0.05 0.1 0.2 0.3 0.4 Miles

NOT FOR CONSTRUCTION

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Speedway Energy Facility

**Figure O-1.3.4
Site Plan with
Five Temporary
Impact Locations**

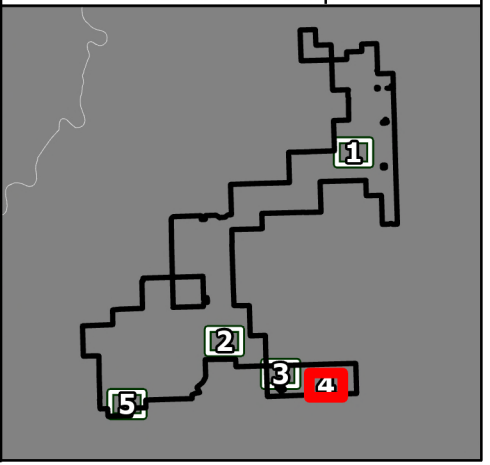
SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- City/Town
- Local Roads
- Other Waters (OHWL)*
- Impact Type
 - Permanent Impact
 - Temporary Impact

* Non-jurisdictional features
excluded from figure set
display

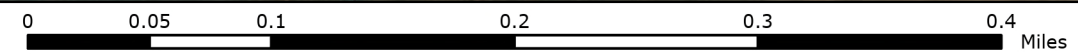


Reference Map



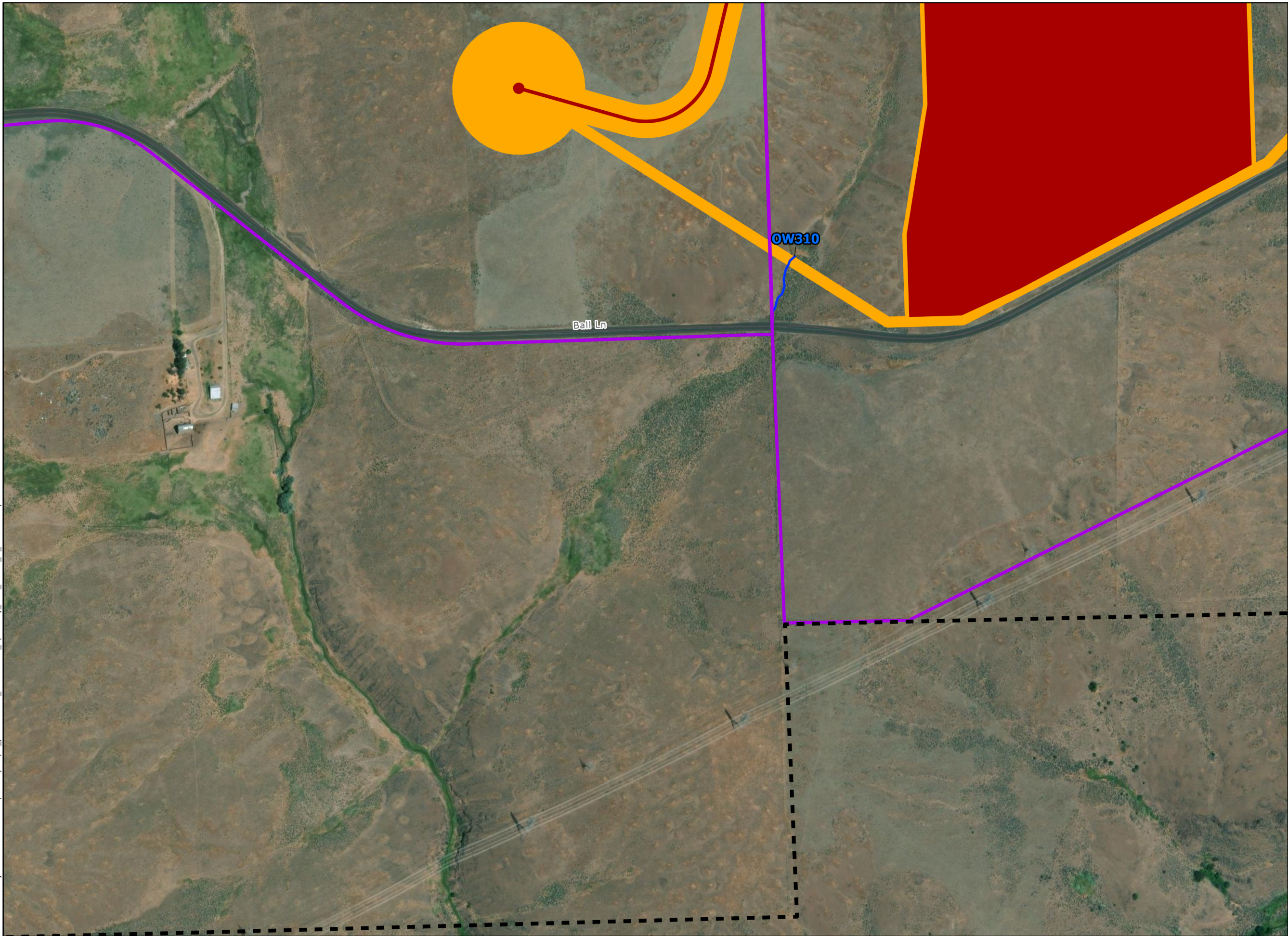
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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

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Speedway Energy Facility

**Figure O-1.3.5
Site Plan with
Five Temporary
Impact Locations**

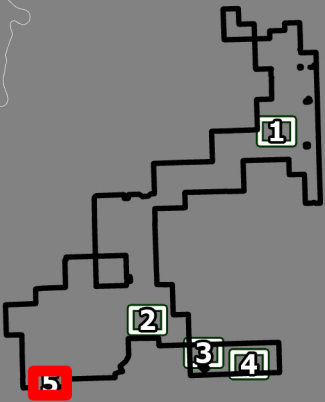
SHERMAN COUNTY, OR

- Facility Site Boundary
- Wetland Survey Area
- City/Town
- Local Roads
- Other Waters (OHWL)*
- Impact Type
 - Permanent Impact
 - Temporary Impact

* Non-jurisdictional features
excluded from figure set
display



Reference Map



1:5,000

WGS 1984 UTM Zone 10N

0 0.05 0.1 0.2 0.3 0.4 Miles

NOT FOR CONSTRUCTION

Attachment 01-1. General Authorization Notification Packet



OREGON DEPARTMENT OF STATE LANDS

GENERAL AUTHORIZATION NOTIFICATION PACKET CONTENTS

A. Instructions for completing the General Authorization Notice, and Fee Explanation	Page 2
B. General Authorization Eligibility Verification Form Blocks 1-9	Page 3
C. Resource Gains and Losses Sheet.....	Page 7
D. General Authorizations Supplemental Pages	
Minimal Disturbance Activities within ESH.....	Page 8
Over-Water Structures Fill and Removal.....	Page 9
Temporary Impact to Wetlands and Waterways	Page 10
Waterway Bank Stabilization Using Bioengineering.....	Page 11
Waterway Habitat Improvement.....	Page 12
Wetland Ecosystem Improvement	Page 13
Notice for Exemption of Certain Voluntary Habitat Restoration Activities	Page 14

OREGON DEPARTMENT OF STATE LANDS

INSTRUCTIONS FOR GENERAL AUTHORIZATION NOTICE

- Step 1.** Read OAR 141-089-0630 to OAR 141-089-0656, and the applicable [administrative rules](#) for the specific GA(s) you are seeking.
- Step 2.** Complete all information in application Blocks 1-7 for your project.
- Step 3.** Complete GA Specific Supplemental Pages(s) for each GA and exemptions (Notification for Voluntary Habitat Exemptions) that applies to your project (located after Block 11)
- Step 4.** Review and sign Block 8.
- Step 5.** Attach all information listed in application in Block 9.
- Step 6.** Attach all information listed on each applicable GA Specific Supplemental Pages(s), located after Block 11.
- Step 7.** Submit the completed notification packet and payment to DSL by mail or online. Current fees and submittal instructions here: <https://www.oregon.gov/dsl/wetlands-waters/Documents/RemovalFillFees.pdf>. **A notice is incomplete until the fee is received.**

Prohibited Areas for Using General Authorizations

- State Scenic Waterway (SSW), as defined by ORS 390.805 et seq.
- Willamette River between river miles 1.9 and 11.8.
- An Aquatic Resource of Special Concern (ARSC), as defined in OAR 141-085-0510, unless the project is for habitat improvement purposes.

Combining Multiple General Authorizations for a Single Project

Any combination of GAs may be used for a single project when the combined activities result in no more than minimal impacts, except for the following.

- Minimal Disturbance Within ESH GA may only be combined with the Temporary Impacts to Wetlands and Waterways GA.
- Non-motorized In-stream Placer Mining in ESH GA cannot be combined with any other GA and cannot apply using this notification form.

Entire Projects / Independent Utility

Projects eligible for GAs must rely solely on GAs for authorization and Notification for Exempt Voluntary Habitat Restoration Activities. The exception is Placer Mining GA, which cannot be combined with any other GA and cannot apply using this Notification Form. GAs may not be combined with any other form of removal-fill authorization.

Acronyms Used in This Notification and/or GA Review Checklist

ARSC	Aquatic Resource of Special Concern	MLLW	Mean Lower Low Water
cyd	Cubic yards	OHW	Ordinary High Water
DEQ	Oregon Dept. of Environmental Quality	OAR	Oregon Administrative Rule
DSL	Oregon Department of State Lands	ODFW	Oregon Department of Fish and Wildlife
ESA	Endangered Species Act	ORS	Oregon Revised Statutes
ESH	Essential Indigenous Salmonid Habitat	OSMB	Oregon State Marine Board
GA	General Authorization	OWRD	Oregon Water Resource Department
GP	General Permit	PW	Permit Waiver
HMT	Highest Measured Tide	SSW	State Scenic Waterway
IP	Individual Permit	NMFS	U.S. National Marine Fisheries
LWRMP	Lower Willamette River Management Plan	USFWS	U.S. Fish and Wildlife Service
MLW	Mean Low Water		

OREGON DEPARTMENT OF STATE LANDS

GENERAL AUTHORIZATION ELIGIBILITY NOTIFICATION FORM

Complete Blocks 1-9 Below for All GA Notifications

(1) PROJECT ACTIVITIES <i>(check all that apply)</i>	
☐ Minimal Disturbance within ESH ☐ Over-Water Structures Fill and Removal ☒ Temporary Impacts to Wetlands and Waterways ☐ Waterway Bank Stabilization Using Bioengineering	☐ Waterway Habitat Improvement ☐ Wetland Ecosystem Improvement ☐ Certain Voluntary Habitat Restoration Activities

(2) CONTACT INFORMATION			
	Responsible Party	Property Owner <i>if different than Responsible Party</i>	Consultant / Contractor <i>optional</i>
Contact Name:	John Soininen	Multiple Landowners	Lauren Stebbins
Business Name:	SGTF Speeday Project LLC		Tetra Tech Inc.
Mailing Address:	200 Liberty St. 14 th Floor		1750 S Harbor Way Suite 400
City, State, Zip:	New York, NY 10281		Portland OR 97201
Phone Number:	(617) 448-1318		503.410.6572
Email:	John.Soininen@brookfieldrenewable.com		lauren.stebbins@tetrattech.com

(3) PROJECT LOCATION INFORMATION		
Project Name: Speedway Energy Facility EFSC Project		
Site Address or Location Description:	City:	County:
Large facility near Grass Valley	Grass Valley	Sherman

(4) PROJECT LEGAL DESCRIPTION <i>(only complete 4A or 4B below)</i>			
(4A) For Single and Multiple Removal Fill Sites <i>(provide information below for each site)</i>			
Latitude, Longitude: <i>(must be in decimal format (e.g., 44.123456, -123.123456))</i>			
45.377709, -120.693081			
45.261779, -120.708389			
45.272150, -120.739349			
45.283978, -120.779711			
45.258479, -120.839967			
Township	Range	Section and 1/4-1/4 (e.g. AB)	<u>Tax Lot(s)</u>
2S	17E	21 and 22	3800
3S	17E	32	3700
3S	17E	32	3900
3S	16E	26	3700
3S	16E	32	3900
(4B) For Linear Projects			
Latitude, Longitude <i>(must be in decimal format (e.g., 44.123456, -123.123456))</i>			
Start point:		End point:	
Start point:			
End point:			

(5) WETLAND AND WATERWAY INFORMATION

☐ Check if designated as [Essential Indigenous Salmonid Habitat](#) (ESH).

☒ Check to confirm the project is **not** within the following areas.

- [State Scenic Waterway](#) (SSW)
- Willamette River miles 1.9-11.8
- Aquatic Resource of Special Concern (ARSC).

☐ Check if you are aware of any contaminants within the project area.

Wetland Name(s) ¹ (if applicable)	Cowardin Classification ²	HGM Classification ²
Waterway Name(s) ¹ (if applicable)	River mile(s)	
OW115	N/A	RFT
OW227	N/A	RFT
OW239	N/A	RFT
OW248	N/A	RFT
OW310	N/A	RFT

¹ If there is no official name for the wetland or waterbody, create a unique name (such as "Wetland 1" or "Tributary A")

² Only one [Cowardin Classification](#) and one [HGM Classification](#) per line. If impacts are proposed to more than one [Cowardin](#) or [HGM](#) classification, separate into different rows.

(6) VOLUMES (for all work proposed within regulated wetlands and waterways)

Note: Volumes do not include BMPs necessary to comply with general conditions (OAR 141-089-0650).

Fill (cyd)		Removal (cyd)		Total (cyd)
50	+	57	=	107

(7) PROJECT DATES

Anticipated Start Date (month/year): June 2027

Anticipated Completion Date (month/year): June 2030

(8) SIGNATURE OF RESPONSIBLE PARTY

By signing below, I understand:

- The information provided herein is, to the best of my knowledge and belief, true, complete, and accurate.
- I am responsible for complying with the requirements and conditions set forth in the applicable administrative rules for General Authorizations and for Certain Voluntary Habitat Restoration activities.
- This approval does not authorize trespass on the lands of others. The responsible party shall obtain all necessary access permits or rights-of-way before entering lands owned by another.
- If this is state-owned submerged or submersible land, there may be additional easements, royalties, and/or other requirements by the Department of State Lands' [Aquatic Resource Management Program](#).
- This approval does not authorize any work that is not in compliance with local zoning or other local, state or federal regulation pertaining to the operations described herein. The responsible party shall obtain necessary approvals and permits before proceeding under this authorization.
- All work done under this authorization must comply with OAR Chapter 340, Standards of Quality for Public Waters of Oregon.
- When [state](#) or [federally](#) listed species are present, the responsible party must comply with the State Endangered Species Act and the Federal Endangered Species Act.
- Violations of the terms and conditions of this authorization are subject to administrative and/or legal action, which may result in revocation of the approval, repair, or recovery of damages. The responsible party is responsible for the activities of all contractors or other operators involved in work done at the site or under this approval.
- The Department of State Lands may, at any time, by notice to the responsible party, revoke or modify this approval if it determines the project scope or conditions of the General Authorization are insufficient to minimize individual or cumulative environmental effects in accordance with OAR 141-085 and 141-089.

- Employees of the Department of State Lands and all authorized representatives must be permitted access to the project area at all reasonable times for the purpose of inspecting work performed on the project.
- In issuing this authorization, the Department of State Lands makes no representation regarding the quality or adequacy of the approved project design, materials, construction, or maintenance except to approve the project's design and materials, as set forth herein, as satisfying the resource protection, scenic, safety, recreation, and public access requirements of ORS Chapter 196 and related administrative rules.
- Responsible party shall defend and hold harmless the State of Oregon, and its officers, agents, and employees from any claim, suit, or action for property damage or personal injury or death arising out of the design, material, construction, or maintenance of the approved improvements.
- A permit from the U.S. Army Corps of Engineers may also be required.
- Responsible Party will submit a post-project report to DSL within 90 days of rectification for a Temporary Impacts to Wetlands and Waterways GA.
- Responsible Party will submit a post-project report to OWEB at <http://www.oregon.gov/OWEB> upon completing the Waterway Habitat Improvement GA and Wetland Ecosystem Improvement GA.

SIGNATURE (*Responsible Party listed in Block 2*)

DATE

(9) ATTACHMENTS (*For complete notification you must include the following.*)

Note: Review the GA Notification Checklist for more details regarding each submittal requirement.

Required for All Projects, Unless it States Otherwise

- ☒ **Applicable GA Specific Supplemental Page(s).** Located after Block 11.
- ☒ **Applicable GA Specific Supplemental Page(s) Attachments.** The requirements are listed on each GA Specific Supplemental Page, located after Block 11.
- ☒ **Resources Gains and Losses Sheet – *Only for the following:*** Temporary Impacts to Wetlands and Waterways GA, Waterway Habitat Improvement GA, Wetland Ecosystem Improvement GA, and Certain Voluntary Habitat Restoration Activities.
- ☒ **Project Details**
 - ☒ **Sufficient detail to demonstrate compliance** with the project notification (OAR 141-089-0640), general condition requirements (OAR 141-089-0650), and the eligibility requirements, and project-specific conditions (OAR 141-089-0660 through 141-089-0815).
 - ☒ **Description of project, materials, construction methods, and erosion control methods.**
 - ☒ **Contaminated Materials.** *If* you are aware of contaminants, describe known contaminated material within the project area and discuss how the contaminants will be handled.
- ☐ **Request Deviation From Rule.** If the project proposes deviations from a standard stated in rule that states “unless other approved by the Department”, describe and demonstrate all the following.
 - Why the deviation is needed.
 - The deviation would cause no more than minimal individual and cumulative environmental impacts.
 - The deviation would not result in long-term harm to the water resources of this state.
- ☒ **ODFW In-water Work Window Variance.** If the project proposes work outside the ODFW in-water work window, include a variance request form. A variance fee and payment instructions will be sent to you.
- ☐ **Lower Willamette River Management Plan – *Only for Willamette River miles 0-1.8 and 11.9-18.*** Provide sufficient information for DSL to determine the project is compliant without the need for a minor exception, unless preapproved by the Director, or a major exception.
- ☒ **Project Location Map.** Sufficient detail for someone to drive to the site from the nearest city/town or major highway intersection. Show boundaries of the entire project, which includes staging and access.

- ☒ **Recent Aerial(s) of the Project Area.**
- ☒ **Project Area Photo(s) with Photo Location Map.** Photo(s) of existing conditions. *(optional)*
- ☒ **Plan View Drawing(s).** *Do not use "typical" drawings, unless otherwise approved by DSL.*
 - Scale bar, north arrow, property boundaries.
 - Entire project boundary, which includes construction access and staging.
 - Existing and proposed contours. If proposed is the same as existing, state that.
 - Existing and proposed jurisdictional boundaries (OHW, [HMT](#), wetland boundary, and compensatory mitigation boundary if any. If proposed is the same as existing, state that.
 - Proposed temporary and permanent impact boundaries identified separately.
 - Existing soil contamination boundary, if applicable.
 - 100-year floodplain line - Only for *Wetland Ecosystem Improvement GA*.
 - Location of cross-section(s)
- ☒ **Cross-section Drawing(s).** *Do not use "typical" drawings, unless otherwise approved by DSL.*
 - Horizontal and vertical scale bars.
 - Existing and proposed contours. If proposed is the same as existing, state that.
 - Existing and proposed jurisdictional boundaries (OHW, [HMT](#), wetland boundary, and compensatory mitigation boundary if any. If proposed is the same as existing, state that.

RESOURCE GAINS AND LOSSES SHEET

Only complete for:

Temporary Impacts to Wetlands and Waterways GA

Waterway Habitat Improvement GA

Wetland Ecosystem Improvement GA

Certain Voluntary Habitat Restoration Activities

Waterway Habitat Gains

- ☐ Total stream length improved: _____ linear feet.
- ☐ Total stream length opened that were previously inaccessible to migrating fish:
_____ linear feet OR _____ miles (round miles to the nearest 0.0001 miles).
- ☐ Restored side channels and alcoves: _____ linear feet.
- ☐ Riparian upland vegetation planting: _____ linear feet.

Wetland Habitat Loss

Wetland Name	Acres ¹		Cowardin Class ²	HGM Class ²
		of		
		of		

Wetland Habitat Gains

Wetland Name	Acres ¹		Cowardin Class ²	HGM Class ²
Restoration / Reestablishment (restore an upland to historic wetland conditions)				
		of		
Enhancement / Rehabilitation (repair functions to a disturbed wetland)				
		of		
Creation (create a new wetland from upland)				
		of		

Temporary Impacts (Only for Temporary Impacts to Wetlands and Waterways GA)

Name	Acres ¹	Linear Ft	Cowardin Class ²	HGM Class ²
Wetland				
		of	n/a	
Waterway				
OW115	n/a	of	50	R4
OW227	n/a	of	50	R4
OW239	n/a	of	50	R4
OW248	n/a	of	50	R4
OW310	n/a	of	50	R4

¹ If >0.01 acres, round to the nearest 0.01 acres. If <0.01 acres, round to the nearest 0.001 acres.

² Only one (1) [Cowardin Classification](#) and one (1) [HGM Classification](#) per row. Add additional rows if needed.

Only complete for:
**General Authorization for
Temporary Impacts to Wetlands and Waterways**
OAR 141-089-0700 through 141-089-0715

Project Activity (check all that apply)

- ☐ **Temporary Impact to Non-Tidal Wetlands (≤ 0.50 acres)**

Acres of wetland impacts: _____ acres

- ☐ **Temporary Impact to Tidal Wetlands (≤ 0.20 acres)**

Tidal wetlands are wetlands located between [highest measured tide](#) and extreme low tide elevations.

Acres of wetland impacts: _____ acres

- ☒ **Temporary Impact to a Waterway for Work Area Isolation (≤ 100 linear feet)**

Length of waterway isolated: 50' (5 segments) linear feet

All work will be conducted when water is not present and the channel is dry.

- ☐ **Temporary Impact for Barge Spud Piles in a Waterway**

Volume

Note: Total cubic yards = cubic yards of removal + cubic yards of fill.

Total: 107 cubic yards

For Complete Notification, Attach All The Following

- ☒ **ODFW Fish Passage Plan Approval – Only for activities listed below.** Fish Passage Plan authorization or no jurisdiction determination from ODFW.

- Wetland impacts *below* ordinary high water line or [highest measured tide](#) line.
- Waterway impacts for work area isolation.

Applicant will verify if a fish passage plan is required for ODFW for the proposed work and provide an email from the District Fish Biologist.

- ☒ **Current, DSL Approved Delineation.** Provide a copy of a current, DSL approved delineation map and concurrence letter. WD2025-0687 Concurrence Letter

- ☐ **Wetlands Resource Characteristics – Only for the activities listed below.** Describe the following for each wetland 1) dominant plant species, 2) hydrology source, and 3) if known, any listed species.

- Temporary impacts to non-tidal wetlands.