

Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit L. Public Services

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



BGTF Speedway Project LLC

Prepared by



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July 2026

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ADT	Average Daily Traffic
Applicant	BGTF Speedway Project LLC
ASC	Application for Site Certificate
BESS	battery energy storage system
BMP	best management practices
BPA	Bonneville Power Administration
CFR	Code of Federal Regulations
ESCP	Erosion and Sediment Control Plan
FAA	Federal Aviation Administration
Facility	Speedway Energy Facility
gen-tie	generation tie
kV	kilovolt
LLC	limited liability company
MW	megawatt
NPDES	National Pollutant Discharge Elimination System
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODA	Oregon Department of Aviation
ODOE	Oregon Department of Energy
ODOT	Oregon Department of Transportation
OR-#	Oregon Route [designation]
ORS	Oregon Revised Statutes
RFPD	Rural Fire Protection District
ROW	right of way
RV	recreational vehicle
US-#	U.S. Route [designation]

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

The information contained herein supports demonstration of compliance with the Public Services approval standard for Oregon Administrative Rules (OAR) 345-022-0110.

2.0 Analysis Area

In accordance with OAR 345-001-0010(35)(b) (and as defined in the Project Order [ODOE 2026]), the analysis area for public service providers is the area within and extending 10 miles from the site boundary (Figure L-1; ODOE 2026). The site boundary is defined in detail in the Background Information Exhibit and is shown on Figure L-1.

For applicable public service provider evaluations, communities outside of the analysis area are considered. Specifically, to encompass the relevant local labor market for Facility construction, a commute of up to 60 minutes is assumed for the housing analyses (see Sections 3.2.2.5 and 3.3.6; Attachment L-1, Speedway Energy Facility Workforce and Housing Availability Analysis).

3.0 Impacts to Public Services – OAR 345-022-0110(4)(a)

(4) To assist the Council in determining whether the standard outlined in (1) through (3) has been met, the Applicant must submit:

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

The Public Services Exhibit describes how the Facility may affect local employment, population, housing, and transportation, as well as the ability of affected communities in the analysis area to provide public services due to Facility construction and operation.

3.1 Assumptions Used to Evaluate Potential Impacts – OAR 345-022-0110(4)(a)(A)

(A) The important assumptions the applicant used to evaluate potential impacts;

Potential impacts to public service providers were evaluated based on assumptions for the number of employees needed to construct and operate the Facility, population fluctuations, and usage of transportation routes, as described in the following sections.

3.1.1 Employment

3.1.1.1 Construction

The Applicant anticipates that construction may begin as early as Q3 2027 and proposes to construct the Facility in a single phase of approximately 30 months. An estimated average workforce of 600 people will be employed during construction of the Facility, with a maximum of 1,049 people during the peak months of construction. Most workers will be employees of construction and equipment manufacturing companies under contract to the Applicant. Some specialty laborers will be required for installation of wind, solar, and battery energy storage system (BESS) components. See Attachment L-1 for the full analysis of Facility construction labor demand.

Construction workers would include a mixture of general construction and specialized workers within a commutable duration of 60 minutes from the site boundary (i.e., from Sherman, Wasco, Hood River counties in Oregon, and Klickitat County in Washington). While not all of these counties are located in their entirety within the analysis area or within 60 minutes of the Facility, housing data was reviewed for all of the counties because housing data is available at the countywide level. Additional communities were considered as appropriate if they were located just outside the 60-minute commute duration (see Attachment L-1).

For purposes of this analysis, consistent with the Project Order (ODOE 2026), the conservative assumption was made that 38 percent of construction workers will be hired locally. The Workforce and Housing Availability Analysis (Attachment L-1) provides a detailed analysis of potential availability of a local workforce and concludes that the regional labor market may support the Facility's necessary workforce. Regardless of the assumptions used for this analysis, the Applicant's policy will be to hire locally to the extent practicable. Local hiring will depend on the availability of workers with the appropriate skill sets. As described in Attachment L-1, the Facility could create employment opportunities that span months and potentially over a year for some workers. However, for purposes of this analysis, the Applicant conservatively assumes that very few non-local construction workers will relocate their families or permanently relocate to the area. See Attachment L-1 for the full analysis of workforce and housing availability considering the Facility labor demand and local labor supply.

3.1.1.2 Operations

It is estimated that up to 20 permanent employees will be hired to operate and maintain the Facility, including seasonal vegetation maintenance personnel as required. O&M staff will be hired locally, to the extent that skilled workers are available. Some outside contractors may be required from time to time for specialized maintenance tasks, such as wind turbine and solar panel

inspections, or for positions that require previous experience at other wind/solar generation facilities.

3.1.1.3 Decommissioning

Upon Facility decommissioning, all operational jobs will be eliminated; however, there may be short-term contract jobs to monitor revegetated/restored areas. Decommissioning of the Facility will require removal of most Facility components, including removal of the wind turbines, solar arrays, and other related or supporting facilities, and restoration of disturbed areas. These activities will result in temporary decommissioning employment similar to the construction of the Facility (average of about 600 people for Facility construction). Decommissioning is estimated to require a similar duration to construction; i.e., up to 30 months.

3.1.2 Population

3.1.2.1 Construction

Population in the analysis area will moderately increase as a result of Facility construction; however, the increase will be temporary. For this analysis, it is assumed that 38 percent of the construction workers would be local residents, applied to an average of up to approximately 600 workers and a maximum of about 1,049 workers. The actual number of temporary residents (i.e., in-migrants) may be lower as labor needs shift over the course of construction (see Attachment L-1). The in-migrants will likely settle in hotels, motels, recreational vehicle (RV) parks, houses, and other temporary housing located within a commutable duration from the Facility (60 minutes).

3.1.2.2 Operations

An estimated 20 permanent employees will be hired to operate and maintain the Facility, and some will already be local residents. Assuming conservatively that 50 percent (i.e., 10) of these employees are in-migrants with an average household size of three (higher than for temporary employees), up to approximately 30 new permanent residents could be added to the local population. It is assumed that these workers will live locally. It is also assumed that the seasonal/temporary employees will live locally.

3.1.3 Transportation

Various transportation routes will provide access to the Facility during construction and operations. These routes will be utilized for the transportation of wind and solar components, other equipment and materials, water, and workers from outside of the analysis area to the Facility and will include state, county, and private roadways. Primary and secondary transportation routes are depicted in the Traffic Impact Study (TIS), provided as Attachment L-2 of this Application for Site Certificate (ASC).

3.1.3.1 Primary and Secondary Transportation Routes

The primary transportation route is assumed to carry the majority of construction vehicles, workforce traffic, and material and equipment deliveries. The primary route will be via Interstate Highway 84 (I-84) to US-97 at Biggs Junction, approximately 28.7 miles to the Facility site boundary and onto multiple local roads as described below (Figure L-2). 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. This route will also be the preferred route for oversized deliveries for Facility construction, such as wind turbine components.

The northeast portion of the Facility—which includes 11 turbines, additional solar arrays, and two laydown yards—would be accessed via proposed driveways connecting to Rutledge Road, Lone Rock Road, and the segment of Smith Todd Road directly to the west of Lone Rock Road.

The south central and southwest portion of the Facility—which includes 33 wind turbines, additional solar arrays, and two laydown yards—would be accessed via proposed driveways connecting to Earls Lane, OR-216, Davis Lane, Michigan Lane, Finnegan Road, Twin Lakes Road, Ball Lane, and US-97.

Some traffic may opt to use secondary transportation routes if coming from the south. The possible routes from the south would include US-197, OR-216, and US-97 as possible ways to reach the Facility. This would most likely be limited to commuting workers that live in communities along those routes. Additional roads near the Facility parcels but not anticipated to be used by construction traffic include Rosebush Lane, Stark Road, Bourbon Lane, and Barnum Lane. As such, detailed descriptions of these roadways have not been included in this exhibit.

It is anticipated that O&M staff (both permanent and seasonal) will commute to the Facility site from nearby communities using similar routes as described above. 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.

3.1.3.2 Truck and Commuter Traffic

A detailed summary of anticipated truck and worker trips is provided in the TIS (Attachment L-2). The total number of workers during construction will vary between different activity phases, with an expected average of 600 round trips generated per day. The peak of commuting worker trips is anticipated to occur in Summer 2029 and would result in a maximum of 1,049 round trips per day. Truck traffic will also be generated as a result of materials and equipment delivery during the Facility's construction. The Applicant assumes there will be an average of 197 trucks visiting the site per day, which would result in around 394 one-way trips. The peak of truck trips would occur in Spring 2028, with a maximum of 384 trucks making deliveries daily. The combined peak daily trips would reach 1,320 round-trips per day, or 2,640 one-way trips in Summer 2028. A secondary

peak in traffic would occur in Spring 2029 when the commuting worker trips peak, resulting in 1,280 round trips per day, or 2,560 one-way trips.

A variety of truck types will be required for material and equipment deliveries. These include heavy-duty trucks, such as semi-trailer dump trucks and 40-foot container trucks, that will be carrying gravel and other materials required to improve or construct new access roadways. These heavy-duty trucks will also provide aggregate and water for concrete production. There would also be truck traffic generated within the site and on the roads used to travel between parcels as concrete is batched and transported to each turbine foundation location. Semi-trailer flat beds carrying electrical equipment and materials required for BESS construction will also be necessary.

For the transport of oversized deliveries such as turbine components and blades, oversized vehicles will be required. These vehicles include a 7-axle dolly and a 13-axle double Schnabel. In total, 880 one-way trips would be made to and from the Facility by these vehicles.

Typical operations traffic will be minimal, as the Facility will only employ up to 20 permanent on-site workers (including vegetation maintenance, wind turbine, solar panel, and electrical maintenance, and all other related activities). Workers are assumed to reside within a commutable duration of 60 minutes from the site boundary (i.e., from Sherman, Wasco, Hood River counties in Oregon, and Klickitat County in Washington), with approximately 3 to 5 workers coming from each of these areas. Occasional delivery trucks may also access the site to deliver routine office supplies to the O&M buildings. Therefore, during operations, an average of approximately 20 round-trip commuter trips per day will occur on weekdays (Monday to Friday). Larger amounts of traffic may be generated only if Facility components need significant repairs or replacement.

I-84 and US-97 will see the largest number of trips, including commuter traffic and deliveries. Overweight or oversized deliveries will be delivered via this route. As noted earlier, workforce traffic will also be divided among the primary and secondary routes, with some traffic also using US-197 and OR-216 from the west and south.

3.1.3.3 Points of Origin

During construction, an estimated average workforce of 600 people (including other related Facility infrastructure) will be employed during construction of the Facility, with a maximum of 1,049 people during construction peak. As identified in Section 3.1.1.1, workers may find housing in several communities along the transportation routes and within a 60-minute commute duration of the site boundary (see Section 3.2.2.5, Housing).

It is estimated that up to 20 permanent personnel will be hired for O&M of the Facility. As stated above, workers are assumed to reside within a commutable duration of 60 minutes from the site boundary.

3.2 Affected Public and Private Providers – OAR 345-022-0110(4)(a)(B)

(B) Identification of the public and private providers in the analysis area that would likely be affected;

The following sections identify public and private service providers within the analysis area and address the existing socioeconomic conditions that could be affected by construction and operation of the Facility.

3.2.1 Counties, Cities, and Communities

While the Facility itself is entirely within Sherman County, the 10-mile analysis area includes the eastern portion of Wasco County and western portion of Gilliam County (Figure L-1). Table L-1 presents historical population estimates for communities in Sherman County within the analysis area. Although there are no incorporated communities in Wasco and Gilliam counties that are within 10 miles of the Facility, the counties were included due their proximity to the Facility. Moro, located north of the Facility in Sherman County, is the largest community in the analysis area. Moro had a 2024 population of approximately 392 people, which is 20 percent of Sherman County's total population. See Attachment L-1 for a more detailed overview of the regional demographics surrounding the Facility.

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

Location	Distance from Facility Site Boundary (miles)	Population			2010 - 2020		2020 - 2024	
		2010	2020	2024 ¹	Absolute Change	Percent Change	Absolute Change	Percent Change
OREGON	Within	3,831,074	4,237,256	4,254,293	406,182	10.6	117,037	0.4
Sherman County	Within	1,765	1,870	1,938	105	5.9	68	3.6
Grass Valley	0.4	164	149	261	-15	-9.1	112	3.6
Moro	3.2	324	367	392	43	13.3	25	6.8
Wasco County	3.6	25,213	26,270	26,552	1,057	4.2	282	1.1
Gilliam County	5.5	1,871	1,995	1,971	124	6.6	-24	-1.2
Source: U.S. Census Bureau 2010, 2020a, 2024a								
1. Most current population data available for all locations at the time of the analysis (May 2026).								

All communities within a commutable duration (60 minutes) are considered in the housing analysis (see Sections 3.2.2.5 and 3.3.6). According to the most recent available U.S. Census Bureau (2020b) residence to workplace/commuting flows data for 2016 to 2020, nearly 69 percent of Sherman County residents work within Sherman County (562 commuters per day). Sherman County receives 160 commuters per day from Wasco County and 68 commuters per day from Klickitat County, Washington. The remaining 27 Sherman County commuters travel from multiple other, more distant counties. As of 2025, 45 percent of Sherman County residents work within Sherman County, and Sherman County receives 22 percent of workers from Wasco County, 6 percent from Umatilla County, 5 percent from Multnomah County, and 23 percent from other Oregon counties (U.S. Census Bureau 2025; see Attachment L-1).

3.2.2 Service Providers

3.2.2.1 Sewers and Sewage Treatment

No community in the analysis area currently provides sewers or sewage treatment to the Facility site. The nearest developed sewer systems are located in the communities of Grass Valley and Moro, approximately 0.5 and 3 miles from the site boundary, respectively. Sewage treatment in this rural area is limited to on-site private septic systems. During construction, sanitary waste will be collected on-site in portable toilets that will be provided and maintained by a licensed subcontractor. During operation, sanitary waste will be limited to domestic wastewater from the O&M buildings, which will be discharged to licensed on-site septic system located within the site boundary.

3.2.2.2 Water Services

Water sources in the site boundary are limited to private landowners' wells. Most communities within the analysis area have public water systems that serve their respective areas, but those systems will not be used or affected by the Facility. The nearest developed water systems are located in the communities of Grass Valley and Moro, approximately 0.5 and 3 miles from the site boundary, respectively. During construction, water will be sourced from wells on-site or trucked to the site from nearby utilities/municipalities, or local other licensed providers. These utility providers can provide sufficient water to meet the Facility requirements (see Exhibit O-2 – Water Use). Alternatively, water may be obtained from a municipality-approved source or other source that has regulatory approval for construction use. During operations, water will be provided by newly constructed wells that will provide no more than a total of 5,000 gallons per day, or from nearby municipalities with existing water rights. See Exhibit O-2 – Water Use for a more detailed discussion.

3.2.2.3 Stormwater Drainage

No community in the analysis area currently provides stormwater drainage service to the Facility site, with the exception of minimal stormwater drainage facilities associated with public roads maintained by Sherman, Wasco, and Gilliam counties, or the Oregon Department of Transportation (ODOT). The nearest developed stormwater drainage facilities in the vicinity of the Facility are located outside of the analysis area (e.g., The Dalles). The Facility will not connect to or otherwise impact any communities' stormwater systems. During construction, numerous best management practices (BMPs), outlined in the Facility's National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Discharge General Permit 1200-C and accompanying Erosion and Sediment Control Plan (ESCP), will be implemented to minimize erosion and sedimentation that could alter the surrounding stormwater drainages. See Exhibit C – Soil Protection for more details.

3.2.2.4 Solid Waste Management

The incorporated communities near the Facility will provide solid waste management services to their respective incorporated areas. Sherman, Wasco, and Gilliam counties provide solid waste disposal and recycling services through franchise agreements with various private providers. Solid waste disposal for the Facility during construction and operations will be provided by private contract with a local commercial hauler or haulers. The public landfill closest to the Facility is the Columbia Ridge Landfill, located approximately 24 miles northeast of the site boundary in Arlington, Oregon. The Columbia Ridge Landfill has confirmed that it has sufficient capacity to accommodate the Facility's solid waste needs and has projected that over 140 years are left in the landfill's current footprint (see Attachment L-3).

3.2.2.5 Housing

Varying housing options are provided in incorporated and unincorporated communities within the analysis area, and within a commutable duration from the Facility (60 minutes) outside of the analysis area. Typically, construction employment for a project such as this is relatively short-term, and workers drawn to the region for this opportunity are unlikely to relocate permanently to the region or relocate with their families. Thus, few construction workers are likely to purchase housing in the region. Due to the 30-month construction duration, the Facility could create employment opportunities that span over a year for some workers. These workers would likely choose rental housing over temporary hotel/motels and RV parks. Thus, the analysis focuses on these three housing types: rental housing, hotel/motel lodging, and RV parks (see Attachment L-1 for the full analysis details). The housing availability analysis provided in Attachment L-1 examined available online data, and additional housing is available within 60 minutes of the Facility area in RV campgrounds or private, long-term rentals offered through companies such as Airbnb. Note that the Applicant has not proposed any temporary housing facilities for construction workers as part of this ASC, but the Applicant understands that the state may be developing regulations to allow temporary workforce housing for renewable energy projects. Accordingly, the Applicant would secure any necessary authorizations for such facilities directly from the relevant permitting authority if this were to become a strategy pursued in the future.

Rental Housing

Table L-2 summarizes the rental housing availability for the reasonable commuting area for the Facility, as sourced from Attachment L-1. The final column shows the estimated number of vacant rental units as of 2024 (U.S. Census Bureau 2024b). The data in Table L-2 are drawn from the U.S. Census Bureau survey data but, particularly in small communities, have high margins of error and may not accurately reflect actual availability at the time of the survey, and don't precisely reflect current availability. Rental housing in all four counties is limited, though rental housing units make up close to or more than half the housing stock in certain communities, such as Tygh Valley, Rowena in Wasco County, Hood River City in Hood River County, and Lyle in Klickitat County.

Table L-2. Housing Supply in Counties and Communities within Commutable Duration

Location	Total Housing Units (Occupied or Vacant)	Percent of Housing Units that are Rentals	Percent of Rental Units that are Vacant	Estimated Number of Vacant Rental Units
Sherman County, OR	979	27	3	9
Wasco	240	24	0	0
Moro	183	36	0	0
Rufus	141	19	7	2
Other towns, cities, and Census Designated Places (CDPs)	415	-	-	7
Wasco County, OR	12,102	31	2	86
The Dalles	6,812	38	2	62
Chenoweth	696	30	9	19
Pine Hollow CDP	561	1	0	0
Other towns, cities, and CDPs	4,033	-	-	5
Hood River County, OR	10,210	30	4	120
Hood River	4,037	44	6	108
Cascade Locks	757	21	7	12
Odell CDP	735	11	0	0
Other towns, cities, and CDPs	4,681	-	-	0
Klickitat County, WA	10,722	23	2	60
Goldendale City	1,797	43	3	21
White Salmon City	1,380	27	4	16
Dallesport CDP	612	28	0	0
Trout Lake CDP	376	16	0	0
Other towns, cities, and CDPs	6,557	-	-	23
Total	34,013	-	-	275
Source: U.S. Census Bureau 2024b; see Attachment L-1				

Hotels/Motels

Hotel/motel accommodations are plentiful within a commutable duration. There are 39 active hotel properties in the region encompassing Sherman, Wasco, Hood River, and Klickitat counties. There are 1,958 rooms in the four-county area, predominantly consisting of economy and midscale hotels (accounting for 74 percent of the total room supply). Between June 2024 and May 2025, the occupancy rate (percent of room nights available sold) was 66.6 percent. Between May 2020 to May 2025, there has been a small increase (0.74 percent) in supply growth, but demand has been rising at a 2.8 percent annual rate. Room rates have been increasing 0.7 percent a year above inflation (CoStar Group 2025; see Attachment L-1).

As demonstrated in Attachment L-1, seasonal occupancy patterns are predicted, with lower demand in the winter months and higher demand in the summer months. From January 2017 to May 2025, the lowest occupancy was just under 40 percent in December and the high was over 80 percent in July; during the shoulder seasons (spring and fall), occupancy averaged just over 60 percent (CoStar Group 2025; see Attachment L-1). The estimated number of available hotel/motel rooms is 866 within commutable distance.

RV Parks

Accounting for the average annual occupancy rate, an estimated 267 RV sites are vacant within a 60-minute commute time of the Facility site. Like hotels and motels, they are concentrated along major highways in Oregon and Washington and are generally outside of the 30-minute drive time to the Facility, with the majority between 30 and 60 miles away (Tables L-3 and L-4).

Based on a review of online sources, there are 22 RV parks within Sherman, Wasco, and Klickitat counties with roughly 703 individual RV sites; note that the RV parks in Hood River County lie primarily outside of a 60-minute drive time to the Facility and were not included in the analysis (Table L-3). Nearly all the mobile home and RV parks offer full hookups, and about two-thirds offer dump stations (Table L-4).

Based on interviews with some RV parks, annual occupancy rates average around 58 percent, ranging from 15 to 100 percent depending on the season. Summer occupancy rates tend to be higher than winter rates. One RV park that was interviewed conveyed that they primarily serve solar and wind farm workers with occupancy rates dependent on the status of projects in the area (see Attachment L-1 for full discussion).

Table L-3. Regional RV Park and RV Sites within Commutable Duration

Location	Total RV Parks	Total RV Sites	Vacant RV Sites
Sherman County, OR	4	99	53
Wasco County, OR	12	299	123
Klickitat County, WA	6	305	92
Total	22	703	267
Sources: Chinook RV Park 2025, City of Maupin 2024, Goldendale RV Park 2024, Goldendale RV Park 2026, Grass Valley RV 2024, Hunt Park 2024, Peach Beach Camp Park 2024, Peach Beach RV Park 2026, Rufus RV Park 2024, RV LIFE 2024a, RV LIFE 2024b, RV Life 2026, RV Parky 2024, RVparking 2024, Sherman County 2024, South Wasco Fire & Rescue 2024, Stargazers RV Resort 2024, Stargazers RV Resort 2026, Two Crows Housing 2024, Two Crows Housing 2026, UpRiver RV Park 2025, Washington State Parks 2024, Washington State Parks 2026; see Attachment L-1.			

Table L-4. Regional RV Park Capacity and Amenities

Drive Time to Facility	Number of Sites	Percent of Sites with Full Hookups	Percent of Sites with Dump Stations
0 to 30 minutes	4	100	50
30 to 60 minutes	18	89	56
Total	22	94	53
Sources: Chinook RV Park 2025, City of Maupin 2024, Goldendale RV Park 2024, Goldendale RV Park 2026, Grass Valley RV 2024, Hunt Park 2024, Peach Beach Camp Park 2024, Peach Beach RV Park 2026, Rufus RV Park 2024, RV LIFE 2024a, RV LIFE 2024b, RV Life 2026, RV Parky 2024, RVparking 2024, Sherman County 2024, South Wasco Fire & Rescue 2024, Stargazers RV Resort 2024, Stargazers RV Resort 2026, Two Crows Housing 2024, Two Crows Housing 2026, UpRiver RV Park 2025, Washington State Parks 2024, Washington State Parks 2026; see Attachment L-1			

3.2.2.6 Traffic Safety and Transportation

The provider of transportation services in Sherman County is the Sherman County Road Department. ODOT provides and maintains the state transportation system in the Facility vicinity.

Traffic Volumes

Table L-5 provides the traffic volumes for the anticipated transportation routes for the Facility. Interstate highway volumes were published by ODOT from 2021 through 2024. Table L-5 also shows that from 2021 to 2024, Average Daily Traffic (ADT) volumes for I-84 decreased approximately 2 to 11 percent in the sections closest to major interchanges and increased by approximately 1 percent in the sections between the interchanges. Overall, the section of I-84 near the Facility has an ADT of approximately 19,700 from 2021 to 2024.

From 2021 to 2024, ADT volumes for the section of US-97 near the Facility increased by up to 38 percent. Overall, the section of US-97 near the Facility has an ADT of approximately 3,000 from 2021 to 2024. ADT volumes for the section of US-197 near the Facility increased by approximately 13 to 15 percent in some sections and increased up to 17 percent in other sections. Overall, the section of US-197 near the Facility has an ADT of approximately 1,700 from 2021 to 2024. ADT volumes for the section of OR-216 near the Facility decreased by approximately 2 to 39 percent. Overall, the section of OR-216 near the Facility has an ADT of approximately 100 from 2021 to 2024.

Table L-5. Available Roadway Traffic Volumes

Highway ¹	Location	Milepost	2021	2022	2023	2024	Average Percent Change 2021-2024
I-84							
I-84 (No. 2)	0.50 miles east of Rowena Interchange	77.15	25,518	24,970	25,160	24,747	-3%
I-84 (No. 2)	At Hostetler Way Overcrossing	82.62	23,660	23,112	23,419	23,073	-2%
I-84 (No. 2)	At Webber Street Undercrossing	83.68	23,524	23,004	24,050	23,822	1%
I-84 (No. 2)	0.24 miles west of Brewery Grade Interchange	85.27	25,239	24,749	25,797	25,603	1%
I-84 (No. 2)	0.30 miles east of Brewery Grade Interchange	85.81	24,421	23,944	24,696	24,560	1%
I-84 (No. 2)	0.30 miles east of The Dalles-California Highway (US-197)	87.31	18,067	17,608	18,202	18,113	0%
I-84 (No. 2)	0.30 miles east of The Dalles Dam Interchange	89.13	17,772	17,317	17,966	17,884	1%
I-84 (No. 2)	0.30 miles east of Celilo-Wasco Highway (OR-206)	97.44	16,904	16,485	17,124	17,061	1%
I-84 (No. 2)	0.44 miles southwest of Rufus/John Day Dam Interchange	109.51	14,630	14,294	14,211	13,019	-11%
I-84 (No. 2)	0.30 miles east of Rufus Interchange	110.25	14,574	14,296	13,976	14,012	-4%
I-84 (No. 2)	0.32 miles east of West John Day Interchange, Sherman-Gilliam County Line	114.55	14,525	14,253	13,901	13,940	-4%
US-97							
US-97 (No. 42)	0.02 miles south of Celilo-Wasco Highway Spur	0.05	3126	3,651	3709	3,683	18%
US-97 (No. 42)	0.30 miles south of Wasco-Heppner Highway (OR-206)	7.8	2,595	3,543	3,600	3,575	38%
US-97 (No. 42)	0.40 mile south of Celilo-Wasco Highway (OR-206)	9.22	2,565	3,208	3,259	3,236	26%

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Highway ¹	Location	Milepost	2021	2022	2023	2024	Average Percent Change 2021-2024
US-97 (No. 42)	Wasco Automatic Traffic Recorder, Sta.28-001, 0.83 miles northeast of 1st Street	17.36	3,273	3,232	3,258	3,233	-1%
US-97 (No. 42)	0.02 miles southwest of 1st Street	18.21	3,377	3,745	3,805	3,778	12%
US-97 (No. 42)	0.02 miles south of North Street	27.68	2881	3206	3257	3234	12%
US-97 (No. 42)	0.02 miles north of Union Street	27.91	2,830	3,186	3,237	3,214	14%
US-97 (No. 42)	0.02 miles north of Sherars Bridge Highway (OR-216)	28.34	2,574	2,809	2,854	2,834	10%
US-97 (No. 42)	0.02 miles south of South Street	28.45	2,442	2,752	2,796	2,776	14%
US-97 (No. 42)	0.02 miles northeast of Shaniko-Fossil Highway (OR-218)	56.51	2,348	2,468	2,507	2,489	6%
US-97 (No. 42)	0.20 miles east of The Dalles-California Highway (US-197)	68.46	2,403	2,410	2,449	2,432	1%
US-197							
US-197 (No. 4)	South of Fremont St	1.29	5,198	5,162	4402	4,424	-15%
US-197 (No. 4)	0.84 miles south of Boyd Market Road (North Jct)	10.3	2,987	2,916	2979	2,992	0%
US-197 (No. 4)	0.05 miles south of Boyd Loop Road	13.27	1,721	1,659	1494	1,484	-14%
US-197 (No. 4)	On Mays Canyon Creek Bridge	16.08	1,692	1,631	1446	1,436	-15%
US-197 (No. 4)	0.02 miles south of Dufur Gap Road	22.87	1,666	1,606	1437	1,427	-14%
US-197 (No. 4)	0.05 miles north of Sherars Bridge Highway (OR-216)	33.84	1,700	1,639	1485	1,475	-13%
US-197 (No. 4)	0.05 miles south of Sherars Bridge Highway (OR-216)	33.94	1,385	1,335	1219	1,210	-13%
US-197 (No. 4)	0.07 miles north of Wapinitia Highway (OR-216)	42.36	1,455	1,403	1282	1,273	-13%
US-197 (No. 4)	0.05 miles south of Wapinitia Highway (OR-216)	42.48	1,318	1,271	1356	1,347	2%

Preliminary Application for Site Certificate
Exhibit L. Public Services

Highway ¹	Location	Milepost	2021	2022	2023	2024	Average Percent Change 2021-2024
US-197 (No. 4)	0.30 miles south of Deschutes Avenue, west city limits Maupin	43.96	1,344	1,296	1414	1,404	4%
US-197 (No. 4)	On Deschutes River Bridge	45.84	1,149	1,108	1153	1,145	0%
US-197 (No. 4)	0.02 miles south of Bakeoven Road	45.98	647	624	650	645	0%
US-197 (No. 4)	0.32 miles south of Deschutes River Road, south city limits Maupin	46.4	450	434	531	527	17%
OR-216							
OR-216 (No. 290)	0.10 miles east of The Dalles-California Highway (US-197)	0.05	258	249	253	260	1%
OR-216 (No. 290)	0.02 miles east of Conroy Road	4.72	102	98	100	100	-2%
OR-216 (No. 290)	At Sherar Station railroad undercrossing	6.97	99	95	97	94	-5%
OR-216 (No. 290)	At Wasco-Sherman County Line	8.3	119	115	117	98	-18%
OR-216 (No. 290)	0.02 miles west of Payne Road (East Jct.)	16.06	86	83	84	55	-36%
OR-216 (No. 290)	0.07 miles north of Finnegan Road (Ball Lane/South Jct.)	18.61	67	65	66	47	-30%
OR-216 (No. 290)	0.02 miles north of Davis Lane	21.33	74	71	72	45	-39%
OR-216 (No. 290)	0.02 miles east of Stradley Road	24.76	89	86	87	65	-27%
OR-216 (No. 290)	0.02 miles east of Finnegan Road	25.81	99	95	97	73	-26%
OR-216 (No. 290)	0.02 miles south of South Street	28.23	124	120	122	97	-22%
OR-216 (No. 290)	0.02 miles west of Sherman Highway (US-97)	28.4	144	139	141	93	-35%
Source: ODOT 2021, 2022, 2023, 2024a The number in parenthesis is the internal ODOT number designation for each state highway.							

Pavement Conditions

Road pavement conditions can affect traffic safety. Roads that have poor pavement conditions may have potholes or large cracks. These conditions can cause drivers to swerve or brake suddenly, resulting in unsafe driving conditions. The Applicant reviewed the ODOT 2024 Pavement Condition Report for the state highways within Facility transportation routes, and describes each condition level used (Table L-6, Table L-7; ODOT 2024b).

Table L-6. ODOT 2024 Pavement Conditions within Analysis Area

Roadway	Approximate Milepost	Pavement Condition
I-84 (No. 2)	76.45 - 84.25	Good
I-84 (No. 2)	84.25 - 88.00	Good
I-84 (No. 2)	88.00 - 96.75	Good
I-84 (No. 2)	96.75 - 110.46	Fair
I-84 (No. 2)	110.46 - 125.40	Fair
US-97 (No. 42)	0.40 - 7.00	Fair
US-97 (No. 42)	7.00 - 13.01	Fair
US-97 (No. 42)	13.27 - 18.03	Fair
US-97 (No. 42)	18.03 - 18.43	Fair
US-97 (No. 42)	18.57 - 18.94	Fair
US-97 (No. 42)	18.94 - 27.40	Poor
US-97 (No. 42)	27.40 - 27.93	Good
US-97 (No. 42)	27.93 - 29.30	Good
US-97 (No. 42)	29.30 - 40.55	Good
US-97 (No. 42)	40.72 - 47.50	Good
US-97 (No. 42)	47.50 - 56.70	Good
US-97 (No. 42)	56.70 - 58.50	Good
US-97 (No. 42)	58.50 - 68.66	Good
US-197 (No. 4)	0.93 - 4.40	Poor
US-197 (No. 4)	4.40 - 9.87	Fair
US-197 (No. 4)	9.87 - 12.60	Fair
US-197 (No. 4)	12.60 - 14.46	Fair
US-197 (No. 4)	14.46 - 15.30	Good
US-197 (No. 4)	15.30 - 18.00	Good
US-197 (No. 4)	18.00 - 23.00	Fair
US-197 (No. 4)	27.88 - 32.85	Good
US-197 (No. 4)	32.85 - 37.77	Fair
US-197 (No. 4)	39.33 - 42.90	Good
US-197 (No. 4)	42.93 - 44.95	Good
US-197 (No. 4)	44.95 - 45.95	Good
US-197 (No. 4)	45.95 - 51.00	Good

Roadway	Approximate Milepost	Pavement Condition
OR-216 (No. 290)	-0.05 - 7.03	Good
OR-216 (No. 290)	7.03 - 8.30	Good
OR-216 (No. 290)	8.30 - 12.15	Fair
OR-216 (No. 290)	12.15 - 28.42	Good
Source: ODOT 2024b.		

Table L-7. ODOT Condition Level Descriptions

Image	Condition	Description
	Very Good	Pavement structure is stable with no cracking, patching or deformation evident. Roadways in this category are usually new. Riding quality is excellent; nothing would improve the roadway at this time.
	Good	Stable, minor cracking, generally hairline and hard to detect. Minor patching and possible some minor deformation evident. Dry or light-colored appearance. Very good riding quality; rutting is less than 1/2 inch.
	Fair	Pavement structure is generally stable with minor areas of structural weakness evident. Cracking is easier to detect. The pavement may be patched, but not excessively. Although riding quality is good, deformation is more pronounced and easily noticed. Rutting is less than 3/4 inch.

Image	Condition	Description
	Poor	Includes areas of instability, marked evidence of structural deficiency, large crack patterns or “alligatoring,” heavy and numerous parches. Deformation is very noticeable. Riding qualities range from acceptable to poor. Rutting is greater than ¾ inch.
	Very Poor	Pavement is extremely deteriorated. Numerous areas of instability are present. Majority of the section shows structural deficiency. Riding quality is unacceptable; drivers may slow down.

Source: ODOT 2024b.

As stated in Table L-6, I-84 is in fair to good condition in the region along the primary transportation route. US-97 is in fair to good condition in the region along the primary transportation route, with one section noted as in poor condition between mile markers 18.94 to 27.40. Similarly, US-197 is in fair to good condition in the region along the primary transportation route, with one section noted as being in poor condition from mile markers 0.93 to 4.40. OR-216 is in fair to good condition in the region along the primary transportation route.

Pavement along the sections in “poor” condition (i.e., a portion of US-97 and US-197) is defined as including areas of instability and structural deficiency (ODOT 2024b). The riding quality ranges from acceptable to poor. This may present a hazard to frequent heavy use such as during construction prior to it being repaired, particularly for oversized loads.

Additional roads along the Facility transportation routes do not have assessments by ODOT as they are county roads. The condition of these roads has been evaluated based on the criteria described in Table L-7 using Google Streetview and Maps satellite imagery (Google Maps 2024) as follows:

- Lone Rock Road is in very good condition in the vicinity of the Facility (Google Maps 2024).
- North Street and Blagg Lane are in fair to good condition in the vicinity of the Facility (Google Maps 2024).
- Rutledge Lane is in good condition in the vicinity of the Facility (Google Maps 2024).
- Ball Lane is in fair to good condition in the vicinity of the Facility.

Other minor roads in the vicinity of the Facility did not have street level imagery available.

Air Transportation

Aviation facilities within the analysis area include public, private, and military facilities:

- George Wilson Ranch Airstrip, located approximately 6 miles south of the site boundary (private)
- Wasco State Airport, located 10 miles north of the site boundary (public)
- Miller Island Airstrip, located approximately 16 miles northeast of the site boundary (private)
- Fargher Airfield, located approximately 19 miles west of the site boundary (private)
- Reed Airstrip, located approximately 20 miles east of the site boundary (private)
- Pine Hollow Airport, located approximately 22 miles west of the site boundary (private)
- Columbia Gorge Regional Airport, located approximately 23 miles northwest of the site boundary (public)
- Nelson Ranch Airport, located approximately 23 miles southwest of the site boundary (private)
- Condon State Airport, located approximately 25 miles southeast of the site boundary (public)
- Snyder Ranch Airport, located approximately 25 miles east of the site boundary (private)
- Honald Ranch Airport, located approximately 25 miles northwest of the site boundary (private)
- Chenoweth Airpark-60r2, located approximately 29 miles northwest of the site boundary (private)
- Arlington Municipal Airport, located approximately 31 miles northeast of the site boundary (public)

Federal Aviation Administration (FAA) and Oregon Department of Aviation (ODA) notification will occur prior to beginning construction of the Facility. The Applicant will use the FAA Notice Criteria Tool to identify if a Form 7460-1 is required. If required, the Applicant will submit FAA Form 7460-1 to the FAA and ODA in accordance with Oregon Revised Statute (ORS) 836.535(2)(a) requesting a determination of No Hazard in order to allow the agency to evaluate the effect of the proposed construction on air safety and navigable airspace. Following the submittal of the Facility's notice to the FAA and ODA, if required, the agency will conduct an aeronautical study.

A Determination of No Hazard to Air Navigation will be issued when the aeronautical study concludes that the proposed construction or alteration will exceed an obstruction standard but will not have a substantial aeronautical impact to air navigation. A Determination of No Hazard to Air Navigation may include conditional provisions, limitations to minimize potential problems, supplemental notice requirements, or requirements for marking and lighting, as appropriate. The

Applicant will provide a record of all correspondence with FAA and ODA to the Oregon Energy Facility Siting Council.

3.2.2.7 Police Protection

Police service is primarily provided by county police departments; some of the communities in the analysis area have a community police department that operates within their respective communities but will not cover the site boundary. As necessary, the Applicant will seek assistance from the Sherman County Sheriff's Office, located in Moro, Oregon. Additional law enforcement service is available through the Oregon State Police, with an office in The Dalles. Attachment L-3 includes a record of correspondence with the Sherman County Sheriff's Office confirming that they can provide services in the analysis area.

3.2.2.8 Fire Protection

Fire protection service in the analysis area will be provided by South Sherman Fire & Rescue, which serves as the Rural Fire Protection District (RFPD) for South Sherman County, and Moro RFPD (OOSFM 2026). Attachment L-3 includes records of correspondence with the South Sherman RFPD, Moro RFPD, and Sherman County Emergency Services confirming that the construction and operation of the Facility will not impede their abilities to provide emergency services; South Sherman Fire & Rescue also provided an additional letter of support for the Facility (see Attachment L-3). As the site boundary is completely within the fire protection districts of South Sherman and Moro, any emergency fire response would be by one of these RFPDs, and any assistance by another fire department would be in the service of one of these RFPDs.

3.2.2.9 Health Care

Because population density in the analysis area is relatively low, hospitals and health care services tend to be regional. There are no hospitals within the analysis area, but the closest hospital is the Adventist Health Columbia Gorge Hospital, located 24 miles northwest in The Dalles; this hospital is also considered a Level III trauma center (NEMSIS 2026). The next nearest hospital to the Facility is the Klickitat Valley Heath Hospital Good Shepherd Medical Center, located approximately 26 miles north in Goldendale, Washington. Ambulance service in the area is provided by the Sherman County Emergency Services Department (Sherman County 2026a). Some of the nearby fire districts also have First Response Vehicles, with equipment and crew trained to stabilize a patient until the arrival of an ambulance for transport. In the event of a serious injury during construction or operation of the Facility, the patient may be flown by helicopter (operated by Life Flight) to one of the two Level 1 hospitals located in Portland: Oregon Health & Science University Hospital or Legacy Emanuel Medical Center.

3.2.2.10 Schools

The analysis area falls almost entirely within the Sherman County School District, which services all of Sherman County with a single campus that encompasses grades pre-K through 12th grade (Sherman County 2026b, Sherman County School District 2026). This campus is located in Moro, Oregon, 3 miles north of the Facility site boundary, and is considered the closest school campus to the Facility. A small portion of the analysis area (west of the Facility) is also within the South Wasco County School District (serving Maupin and surrounding areas). Similarly, a small portion of the analysis area (east of the Facility) is also within Gilliam County's Condon School District. Other nearby school districts that are outside of the 10-mile analysis area include the North Wasco County School District serving The Dalles area of Wasco County; the Arlington School District in Gilliam County; and the Goldendale, Wishram, Centerville, and Roosevelt school districts in Klickitat County, Washington.

3.3 Potential Impacts to Public and Private Providers – OAR 345-022-0110(4)(a)(C)(D)

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

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

3.3.1 Economic and Demographic Impacts

In total, the quantity of new temporary construction jobs and new operations jobs created from Facility construction and operations will represent nearly 108 percent of total employment in Sherman County (a total of 973 jobs in Sherman County [U.S. Bureau of Labor Statistics 2025]). The jobs created by the Facility will result in short-term and long-term benefits to overall county employment. See Attachment L-1 for further background regarding workforce availability. Attachment D-2 in Exhibit D – Land Use provides additional information on economic impact from Facility construction and operations.

3.3.1.1 Population and Housing

Significant in-migration for construction-related employment and limited to moderate in-migration for permanent O&M employment are anticipated to occur as a result of the Facility. Temporary, in-migrant construction-related jobs are anticipated to last up to 30 months total. During construction, in-migrant workers likely will stay at area motels or RV parks, eat at local restaurants, and purchase other amenities such as gas and groceries, all resulting in a beneficial impact on the local economy. As described in the Economic Impact Analysis prepared for this Facility (Exhibit D, Attachment D-2), local construction-related expenditures and employment would support an estimated 570 indirect jobs and 280 induced jobs during construction. The total employment

impact from Facility construction is estimated to be 1,899 jobs. Labor income associated with secondary employment (indirect and induced) is estimated to total \$143.8 million over the duration of construction. The total estimated labor income associated with all construction-related spending is \$369.4 million total, and total local economic output for the Facility is approximately \$2.97 billion (see Exhibit D, Attachment D-2 for details).

It is estimated that up to 20 permanent staff will be employed at the Facility for O&M (including vegetation maintenance, turbine/solar panel and electrical maintenance, and all other related activities). Some O&M staff will be hired locally, and some will be hired from outside the area for those positions that require previous experience at other wind or solar generation facilities. It is assumed that these permanent O&M workers will live locally. Making the conservative assumption that 50 percent (a total of 10 employees, worst-case) of the O&M positions are filled from outside the analysis area and the average household size is three, up to approximately 30 new permanent residents could be added to the local population. That amount is small in comparison to the populations of Sherman, Wasco, and Hood River counties in Oregon, and Klickitat County Washington (all within a commutable duration). Thus, it is not anticipated that the Facility will cause adverse impacts to communities within the analysis area.

Impacts on housing could occur if there were an inadequate supply of housing in relation to the demand from the new temporary and permanent residents associated with the Facility. Permanent housing for about 10 new households may be required; it is not yet known where the new temporary and permanent residents associated with the Facility will settle as well as what type of housing they will select. Housing impacts from construction and operations are described in Section 3.3.6.

3.3.1.2 Economic Activity and Tax Revenues

Revenue generated for the local economy will benefit various public services, including schools and other services Sherman County currently offers to its citizens. Counties outside Sherman County would not gain revenue from Facility operation through tax payments; however, they would gain employment opportunities for residents from communities within those counties to be employed during construction and operation of the Facility. Income earned by those individuals due to the Facility will contribute to the local economy indirectly through local purchases. In addition, the Facility itself will purchase goods and services from local and regional businesses to the extent practicable, such as Facility maintenance services, office equipment, and business services. Lease payments to local landowners will also benefit the local economy because it is likely that a portion of the lease payments will be spent in nearby communities. These activities will result in a net inflow of dollars into the local economy that will have a beneficial effect beyond that of the new employment.

Exhibit D, Attachment D-2 provides a detailed assessment of economic activity resulting from Facility operations. Facility operation is anticipated to support approximately 100 direct, indirect, and induced jobs for the 30-year operating life of the Facility. Depending on the final tax structure,

the Facility may also generate property tax or other recurring local tax revenues during operations (see Exhibit D, Attachment D-2 for details).

Removal of approximately 4,659 acres of land (representing approximately 2,330 harvested acres annually), currently in cultivation for winter wheat, from agricultural production would decrease agricultural economic activity in Sherman County. This impact, discussed in detail in Exhibit D and Attachment D-1, is anticipated to result in the removal of a total of 1.8 jobs (anticipated to be mitigated by the 20 operations jobs and associated labor income created by operation of the Facility) and about \$233,000 in labor income per year.

3.3.2 Sewers and Sewage Treatment

The Facility will not have any significant adverse impact on the ability of any community in the area to provide sewers or sewage treatment. The only sewage services required by the Facility during construction will be related to the handling of sewage from contract portable toilets. Portable toilet sewage will be pumped regularly and disposed of at a local treatment facility. The Applicant will install a wastewater facility in the O&M buildings. The domestic-strength waste will be treated by the building's on-site, licensed septic system at the O&M buildings. No other sewage treatment will be needed for Facility operations. Due to the distance to the nearest developed sewer system, the Applicant does not anticipate direct connection to sewers or sewage treatment facilities.

3.3.3 Water Services

No adverse impacts to water use and supply are anticipated during construction or operations. As described in Exhibit O-2, most water required for construction will be used for dust control, compaction of access roads, and concrete production. Water for construction will be sourced from well on-site or purchased from nearby utilities/municipalities pursuant to existing water rights held by the water utilities (see Exhibit O-2 – Water Use). The Facility's water demand will not injure the utilities' existing water right or exceed the amount of water available to the service provider (see Exhibit O-2). Alternatively, water may be provided by another source that has regulatory approval for construction use.

Kitchen and bathroom facilities will be installed in the O&M buildings. The Applicant expects to rely on exempt wells allowed under ORS 537.545 to provide water to the O&M buildings and for Facility operations. Nominal amounts of water will be needed for domestic purposes (hand washing, drinking, toilets) and each on-site exempt well will cumulatively provide less than 5,000 gallons per day for domestic use. Given that the operational water needs of the Facility represent an insignificant fraction of the total municipal water use in the analysis area, 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.

3.3.4 Stormwater Drainage

No adverse impacts on the ability of any community to provide stormwater drainage are anticipated from Facility construction and operations. During Facility construction, stormwater drainage impacts could occur from new and improved roads, temporary construction areas, and concrete foundations. Adherence to the erosion control measures included in the Facility's NPDES Construction Stormwater Discharge General Permit 1200-C and accompanying ESCP will prevent adverse impacts related to construction of these facilities. Exhibit C discusses the 1200-C permit in more detail. The site boundary is located in a rural area where existing stormwater infrastructure is limited to minimal facilities associated with public roads. Erosion control BMPs used during construction will not affect the provision of stormwater management services by any public agency and Facility components will be designed to maintain existing stormwater drainage patterns. The site boundary is not within a designated drainage district or urban area and is mostly vegetated, which serves as a buffer to promote infiltration and minimize erosion.

Stormwater management infrastructure put in place during construction will be left in place as needed, to continue functioning throughout the life of the Facility where impermeable or semi-impermeable surfaces (e.g., access roads) remain to support O&M activities. Such features may include roadside ditches, infiltration swales, or retention basins. These facilities will be located on private land and will not affect the provision of stormwater management services by any public agency.

An industrial stormwater permit may be required for Facility operations for the purposes of solar panel washing. However, the permit may not be required if no ground-disturbing activities will occur during operations, no stormwater will be discharged to surface waters of the state, storm sewers, or dry wells, the washing will not use acids, bases, metal brighteners, steam, or heated water, and the area inside the Facility fence line will be revegetated as required by the NPDES Construction Stormwater Discharge General Permit 1200-C.

3.3.5 Solid Waste Management

The Facility will not have any significant adverse impact on the ability of any community in the area to provide solid waste management services. The ability of communities to provide solid waste management services could be impacted if the solid waste management needs from the Facility during construction or operations cannot be met through existing facilities or if meeting those demands interferes with the ability of service providers to meet other community waste management needs (e.g., if local landfill capacity is inadequate to handle the needs of the Facility). Most waste will be removed from the site and reused, recycled, or disposed of at the nearby Columbia Ridge Landfill if necessary. 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 Attachment L-3). As further described in the Background Information Exhibit, little

construction waste will require off-site disposal, and only small amounts of solid waste will be generated during Facility operations. Solid waste disposal for the Facility during construction and operations will be provided through a private contract with a local, licensed commercial hauler or haulers and is not anticipated to disrupt services already being provided in any incorporated communities or in the larger Sherman County area.

3.3.6 Housing

3.3.6.1 Construction Impacts

No significant adverse housing impacts from Facility construction are anticipated. As stated previously, for this analysis, it is conservatively assumed that 62 percent of construction workers would be from outside the assumed 60-minute commuting duration and would require temporary accommodation; based on the projected Facility employment and population amounts, additional temporary housing could be required for up to 648 new individuals during the peak construction period and up to about 324 new individuals on average during the 30-month construction period. Note that Attachment L-1, Workforce Availability Analysis, provides detailed reasoning for why local hiring may be higher as labor needs shift over the course of construction (see Attachment L-1).

If all construction workers sought temporary housing within the 10-mile analysis area, there would not be enough supply to meet that demand, and mitigation, such as additional on-site temporary housing facilities, would be required to diminish the significant housing impact to local communities. However, industry experience and the geography and housing characteristics of this subregion suggest that the discrepancy between available and needed housing demand will in fact be minimal. Experience from comparable energy facilities in eastern Oregon and Washington indicate that significant portions of the specialized construction workforce are unlikely to relocate (and thus would not need local housing) if commuting to work is an option, and that commuting more than one hour is common. Therefore, a 60-minute commute duration is a conservative estimate, as commute times of more than an hour are highly likely to occur. When commute time estimates are increased, the geographic area to support housing grows to include communities in Wasco and Hood River counties, Oregon (i.e., within a 60-minute commute duration), that have greater housing availability as noted above. Housing and living options in these other communities also include other amenities when compared to options within 10 miles, which may further attract workers in need of temporary housing. Although it cannot be assumed with certainty that housing facilities will have vacancies at any given time, adequate supplies are available within a commutable duration in relation to the number of temporary workers. The analysis of rental and transient lodging supply shows that the region can potentially supply 275 rental housing units and 1,134 transient lodging units (i.e., 866 hotel/motel rooms and 267 RV sites), for a total of 1,409 units of total housing annually (see Section 3.2.2.5 and Attachment L-1). This supply is well above the maximum estimates of housing unit demand, i.e., up to 648 units. Thus, it is likely that within the region, the housing market could accommodate the anticipated influx of non-local construction workers.

The housing utilization rate associated with Facility construction is anticipated to range from 0.23 under a double-occupancy assumption to 0.46 under a single-occupancy assumption, indicating a surplus of available rental housing under both scenarios (see Attachment L-1); the potential increase in short term and transient housing demand in the local area due to Facility construction is estimated at a maximum of 648 households assuming single occupancy and 324 households assuming double occupancy. This indicates that available rental supply is expected to be sufficient to accommodate projected construction-related demand with limited housing market pressure, with lower housing utilization rates corresponding to lower levels of market pressure.

For workers requiring transient lodging, the market also has capacity to accommodate the demand, even at peak occupancy rates during the summer season, assuming many of the workers would locate in Wasco County (see Section 3.2.2.5 and Attachment L-1). Hotels and motels are substantially more available than RV sites. Workers who prefer to stay in an RV may have difficulty finding full-hookup sites in Oregon during most of the year, especially during the summer months (see Attachment L-1).

Workers who plan to work on the Facility for more than a year during the 30-month construction period could enter a year-long lease and may prefer rental housing over transient lodging. However, there are fewer vacant rental housing units in the local area than there are total workers seeking housing under both the single and double occupancy scenarios.

If peak demand for Facility construction coincides with elevated regional demand from other economic development activity or population growth potentially occurring through 2030, competition for limited vacant rental housing (namely affordable units) may increase, potentially resulting in tighter market conditions than indicated by the housing availability analysis. At the same time, Sherman County and surrounding areas have demonstrated experience accommodating large-scale infrastructure construction projects, including data centers and renewable energy facilities, which typically require substantial construction workforces (see Attachment L-1).

In sum, regional commuting patterns, significant local hiring, and rotational construction workforce scheduling support that sufficient housing supply is projected to meet peak project demand within the region. Still, to the extent the housing markets closest to the Facility (i.e., Sherman County; see Attachment L-1) have the potential to be constrained as a result of the Facility-related housing demand, the following mitigation measures may be implemented to minimize impacts as necessary (see Attachment L-1 for further detail):

- Develop a detailed housing plan consistent with updated workforce estimates prior to construction.
- Provide housing information to workers prior to the start of their employment.
- Work proactively with Engineering, Procurement, and Construction (EPC) partners to identify housing options and minimize potential issues finding suitable and affordable housing.

- Consult with cities as well as the county as necessary regarding temporary housing options prior to construction.
- Continue to work with local officials such as Sherman County Commissioners, nearby cities and towns such as Grass Valley, Moro, and Wasco, the Sherman and Wasco County Community Development departments and associated commissions to obtain current information and to ensure information provided to workers is consistent with local housing policies and objectives.
- If state regulations are implemented that allow for temporary on-site or off-site workforce housing during construction, the Applicant would secure any necessary authorizations for such facilities directly from the relevant permitting authority.

3.3.6.2 Operations Impacts

No significant adverse impacts on the ability of communities to provide housing are anticipated from Facility construction or operations. Permanent housing for up to 10 new households (with up to three people per household) may be required starting at the beginning of operations. For the estimated 30 new permanent residents expected because of Facility operations, it is anticipated that adequate opportunities will be available to purchase housing or to construct new housing in the analysis area, or within a commutable duration from the Facility outside of the analysis area.

3.3.7 Traffic Safety and Transportation

3.3.7.1 Construction Impacts

No significant adverse traffic impacts are expected from construction of the Facility. A detailed TIS is provided as Attachment L-2 to this ASC, in accordance with the requirements set forth in the Sherman County Zoning, Subdivision, Partitioning, and Land Development Ordinance of 1994 Section 4.13 (Sherman County 2003). The TIS is required for the level of traffic anticipated during construction only. The information below summarizes the detail provided in the TIS.

To determine the Facility's impact on the state highways along the transportation routes, the average ADT for 2028, during which the first construction peak will occur, was estimated using the ODOT 2024 traffic data with a 2 percent growth rate (ODOT 2024a). The estimated 2028 Average Construction ADT value was then used to determine the percent increase due to the Facility, which can be found in Table L-8.

Table L-8. Anticipated Facility Impact to Transportation Routes

Highway ¹	Location	Milepost	2024	2028 Expected ADT	Construction ADT	Percent Change from Construction
I-84						
I-84 (No. 2)	0.50 miles east of Rowena Interchange	77.15	24,747	26,787	28,381	6%
I-84 (No. 2)	At Hostetler Way Overcrossing	82.62	23,073	24,975	26,569	6%
I-84 (No. 2)	At Webber Street Undercrossing	83.68	23,822	25,786	27,380	6%
I-84 (No. 2)	0.24 miles west of Brewery Grade Interchange	85.27	25,603	27,714	29,308	6%
I-84 (No. 2)	0.30 miles east of Brewery Grade Interchange	85.81	24,560	26,585	28,179	6%
I-84 (No. 2)	0.30 miles east of The Dalles-California Highway (US-197)	87.31	18,113	19,606	21,200	8%
I-84 (No. 2)	0.30 miles east of The Dalles Dam Interchange	89.13	17,884	19,358	20,952	8%
I-84 (No. 2)	0.30 miles east of Celilo-Wasco Highway (OR-206)	97.44	17,061	18,467	20,061	9%
I-84 (No. 2)	0.44 miles southwest of Rufus/John Day Dam Interchange	109.51	13,019	14,092	15,686	11%
I-84 (No. 2)	0.30 miles east of Rufus Interchange	110.25	14,012	15,167	16,761	11%
I-84 (No. 2)	0.32 miles east of West John Day Interchange, Sherman-Gilliam County Line	114.55	13,940	15,089	16,683	11%
US-97						
US-97 (No. 42)	0.02 miles south of Celilo-Wasco Highway Spur	0.05	3,683	3,987	5,581	40%

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Highway¹	Location	Milepost	2024	2028 Expected ADT	Construction ADT	Percent Change from Construction
US-97 (No. 42)	0.30 miles south of Wasco-Heppner Highway (OR-206)	7.8	3,575	3,870	5,464	41%
US-97 (No. 42)	0.40 miles south of Celilo-Wasco Highway (OR-206)	9.22	3,236	3,503	5,097	46%
US-97 (No. 42)	Wasco Automatic Traffic Recorder, Sta.28-001, 0.83 miles northeast of 1st Street	17.36	3,233	3,500	5,094	46%
US-97 (No. 42)	0.02 miles southwest of 1st Street	18.21	3,778	4,089	5,683	39%
US-97 (No. 42)	0.02 miles south of North Street	27.68	3234	3,501	5,095	46%
US-97 (No. 42)	0.02 miles north of Union Street	27.91	3,214	3,479	5,073	46%
US-97 (No. 42)	0.02 miles north of Sherars Bridge Highway (OR-216)	28.34	2,834	3,068	4,662	52%
US-97 (No. 42)	0.02 miles south of South Street	28.45	2,776	3,005	4,599	53%
US-97 (No. 42)	0.02 miles northeast of Shaniko-Fossil Highway (OR-218)	56.51	2,489	2,694	4,288	59%
US-97 (No. 42)	0.20 miles east of The Dalles-California Highway (US-197)	68.46	2,432	2,632	4,226	61%
US-197						
US-197 (No. 4)	South of Fremont St	1.29	4,424	4,789	6,383	33%
US-197 (No. 4)	0.84 miles south of Boyd Market Road (North Jct)	10.3	2,992	3,239	4,833	49%
US-197 (No. 4)	0.05 miles south of Boyd Loop Road	13.27	1,484	1,606	3,200	99%
US-197 (No. 4)	On Mays Canyon Creek Bridge	16.08	1,436	1,554	3,148	103%
US-197 (No. 4)	0.02 miles south of Dufur Gap Road	22.87	1,427	1,545	3,139	103%

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Highway ¹	Location	Milepost	2024	2028 Expected ADT	Construction ADT	Percent Change from Construction
US-197 (No. 4)	0.05 miles north of Sherars Bridge Highway (OR-216)	33.84	1,475	1,597	3,191	100%
US-197 (No. 4)	0.05 miles south of Sherars Bridge Highway (OR-216)	33.94	1,210	1,310	2,904	122%
US-197 (No. 4)	0.07 miles north of Wapinitia Highway (OR-216)	42.36	1,273	1,378	2,972	116%
US-197 (No. 4)	0.05 miles south of Wapinitia Highway (OR-216)	42.48	1,347	1,458	3,052	109%
US-197 (No. 4)	0.30 miles south of Deschutes Avenue, west city limits Maupin	43.96	1,404	1,520	3,114	105%
US-197 (No. 4)	On Deschutes River Bridge	45.84	1,145	1,239	2,833	129%
US-197 (No. 4)	0.02 miles south of Bakeoven Road	45.98	645	698	2,292	228%
US-197 (No. 4)	0.32 miles south of Deschutes River Road, south city limits Maupin	46.4	527	570	2,164	279%
OR-216						
OR-216 (No. 290)	0.10 miles east of The Dalles-California Highway (US-197)	0.05	260	281	1,875	566%
OR-216 (No. 290)	0.02 miles east of Conroy Road	4.72	100	108	1,702	1473%
OR-216 (No. 290)	At Sherar Station railroad undercrossing	6.97	94	102	1,696	1567%
OR-216 (No. 290)	At Wasco-Sherman County Line	8.3	98	106	1,700	1503%
OR-216 (No. 290)	0.02 miles west of Payne Road (East Jct.)	16.06	55	60	1,654	2677%
OR-216 (No. 290)	0.07 miles north of Finnegan Road (Ball Lane/South Jct.)	18.61	47	51	1,645	3133%

Highway ¹	Location	Milepost	2024	2028 Expected ADT	Construction ADT	Percent Change from Construction
OR-216 (No. 290)	0.02 miles north of Davis Lane	21.33	45	49	1,643	3272%
OR-216 (No. 290)	0.02 miles east of Stradley Road	24.76	65	70	1,664	2266%
OR-216 (No. 290)	0.02 miles east of Finnegan Road	25.81	73	79	1,673	2017%
OR-216 (No. 290)	0.02 miles south of South Street	28.23	97	105	1,699	1518%
OR-216 (No. 290)	0.02 miles west of Sherman Highway (US-97)	28.4	93	101	1,695	1583%
Source: ODOT 2024a. The number in parenthesis is the internal ODOT number designation for each state highway.						

As shown in Table L-8, in 2024 I-84 carried an ADT volume of approximately 19,600 vehicles between Rowena and Rufus, Oregon. Based on the above ADT estimates, for the construction period, construction vehicles could cause an average increase to 23,000 if 100 percent of the average construction traffic uses this route, which is a total increase of about 9 percent. I-84 is expected to be able to accommodate this increase.

As shown in Table L-8, in 2024 US-97 carried an ADT volume of approximately 3,100 vehicles between the Celilo-Wasco Highway and the Dalles-California Highway (US-197). Based on the above ADT estimates, for the construction period, construction vehicles could cause an average increase to 5,000 if 100 percent of the average construction traffic uses this route, which is a total increase of about 48 percent.

The secondary transportation routes include US-197 and OR-216. As shown in Table L-8, in 2024 US-197 carried an ADT volume of approximately 1,600 vehicles between Fremont Street and the south city limits of Maupin, Oregon. Based on the above ADT estimates, for the construction period, construction vehicles could cause an average increase to 3,300 if 100 percent of the average construction traffic uses this route, which is a total increase of about 121 percent. As shown in Table L-8, in 2024 OR-216 carried an ADT volume of approximately 90 vehicles between the Dalles-California Highway (US-197) and Sherman Highway (US-97). Based on the above ADT estimates, for the construction period, construction vehicles could cause an average increase to 1,700 if 100 percent of the average construction traffic uses this route, which is a total increase of about 2,000 percent.

The maximum increase could cause short term delays. However, the actual volume of construction traffic using the secondary routes should be minimized and will be considerably lower than this value. Traffic impacts are anticipated to be temporary, intermittent, and minimal due to most construction traffic occurring during non-peak recreational hours (i.e., weekend) and a secondary

transportation route being available. These concerns can be mitigated using appropriate signage and safety measures.

While construction-related traffic may cause short-term traffic delays (because of large, slow-moving delivery trucks and increased congestion), the delays will be temporary and will be minimized by implementing BMPs such as the following:

- 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.
- The Applicant will coordinate with the county Roadmaster to determine appropriate signage and warnings such as "Equipment on Road," "Truck Access," or "Road Crossings."
- The Applicant will coordinate with the county Roadmaster to determine appropriate implementation of traffic-diversion equipment (such as advance signage and pilot cars) if needed when slow or oversize loads are being hauled.
- The Applicant's contractor will employ flag persons as necessary to direct traffic when large equipment is exiting or entering public roads to minimize risk of accidents. Flag persons may facilitate two-way traffic on one lane by alternately restricting travel directions. This method will not require full lane closures, detours, or reroutes. Flag persons will also monitor through traffic on public roadways as necessary so that they are not in conflict with construction vehicles.
- The Applicant's contractor will maintain at least one travel lane so that roadways will not be closed to traffic due to construction vehicles entering or exiting public roads. If lane closures must occur, adequate signage for potential detours or delays will be posted.
- The Applicant and contractor will be responsible for damage to County roads directly caused by the Facility. The road(s) will be repaired in adherence with terms of a Road Use Agreement with the County (see Attachment L-4 for initial draft Road Use Agreement, subject to change based on ongoing discussions with the County).
- The Applicant's contractor will conduct awareness training for construction workforce drivers, including appropriate techniques for sharing roads with recreation users, especially cyclists.

Traffic and Design Standards

Traffic Standards

State highways are designed and constructed to handle legal loads of 80,000 pounds without a permit. During construction, it may be necessary for trucks exceeding the legal load limit to access the site via state highways. These trucks would potentially be used to deliver the substations' transformers or heavy construction equipment. Before construction, the transportation contractor

will consult with the Sherman County Road Department and ODOT to determine whether any segments of roadway or bridges are restricted for travel, and to obtain any oversized/overweight permits required to allow transport of these loads. There are no permanent restrictions on state highways proposed for transportation routes. Because the state highways are built to accommodate overweight vehicles with permits, impacts to safety or roadway pavement conditions are not expected. With the exception of an approximately 8-mile section of US-97 and an approximately 3-mile stretch of US-197 in poor condition, the primary and secondary transportation routes have fair or good pavement conditions (see above Section 3.2.2.6). Vehicles up to 75 feet in length are allowed without special permitting on the primary and secondary transportation routes. There are requirements imposed by Sherman County and ODOT, such as the previously referenced Road Use Agreement, to promote traffic safety and prevent cumulative damage to the pavement along the transportation routes identified in this exhibit.

Design Standards

County and local roadways are expected to safely accommodate Facility construction traffic. Additionally, no county or local roadways are anticipated to require improvement prior to construction. In the future, road conditions could change, thus the Road Use Agreement will reflect what is actually needed at the time of preconstruction compliance for the Facility. To ensure the integrity of local roads, the Applicant will coordinate with local transportation officials to make improvements where necessary to accommodate Facility construction traffic, and improvements will be restricted to areas within the respective rights-of-way.

Roadway Modifications

Oversized vehicles will use limited routes and are required to transport turbine blades, tower sections, hubs, drivetrains, and nacelles. These vehicles include a 7-axle dolly and a 13-axle double Schnabel.

In order to accommodate the oversized load vehicles that will be used to transport wind turbine components and other large equipment to the site, some modifications to turning radii and slope will be necessary. A limited number of roads will be used for oversized vehicles, and necessary routes have been determined based on the proposed placement of access roads to Facility parcels. The proposed roadway improvements are described in detail in Attachment L-2.

The Applicant will work with ODOT and the Sherman County Road Department to ensure that any unusual damage or wear to state or county roads caused by Facility construction is repaired by the Applicant. All county roads on the primary transportation route will be evaluated prior to and after construction of the Facility to determine what, if any, degradation has occurred. Inspections will include monitoring of roadway conditions after the completion of construction activities. Monitoring may include the use of video footage, photographs, and engineer field notes to document road conditions. During construction of the Facility, the contractor will obtain authorization from ODOT and Sherman County before proceeding with overweight loads on state- or county-maintained roadways. The Applicant will strictly abide by travel conditions and transportation equipment requirements enforced by either ODOT or Sherman County. Upon

completion of construction, the Applicant will restore county roads to their pre-construction condition or better, to the satisfaction of the Sherman County Road Department. Regardless of existing pavement conditions, roadway segments will be reviewed prior to any added construction traffic, and a system for monitoring safety or degradation to pavement will be developed for the necessary roadways prior to construction. The Applicant will ensure that the construction and operation of the Facility will maintain ODOT's and Sherman County's road systems in as good or better quality as prior to the Facility's construction.

3.3.7.2 Operations Impacts

No adverse impacts to the transportation network are anticipated during operation of the Facility.

During operations, only 40 one-way trips will be generated per day by the full-time staff traveling to and from the Facility. This is anticipated to have a negligible impact to existing road users.

Occasional maintenance activities may bring in other vehicles, but these would still be likely to be less than 100 trips per day and would represent a minimal impact to existing road users.

3.3.7.3 Air Transportation

Because the Facility includes construction of structures over 200 feet above ground level, formal submission of a Form 7460-1 to the FAA under Code of Federal Regulations (CFR) Title 14 Part 77.9 (Safe, Efficient Use, and Preservation of the Navigable Airspace) is required. FAA Form 7460-1, Notice of Proposed Construction or Alteration, will be completed and filed prior to construction. As required in the Project Order (ODOE 2026), and in support of the FAA filings, turbine and meteorological tower coordinates and elevations have been provided in Attachment L-5.

3.3.8 Police Protection

The Facility will not have a substantial adverse impact on the ability of local communities to provide police protection or law enforcement services. Potential adverse impacts on the ability of communities to provide police protection could result if the Facility itself caused an increased need for police services (e.g., from vandalism or other crime during construction or operations) or if the additional temporary or permanent population from the Facility resulted in such increased need. The additional temporary and permanent workforce is not expected to create any significant concerns. The Applicant will provide 24-hour on-site security such as cameras during construction and effective communications will be established between on-site security personnel and the Sherman County Sheriff's Office. As necessary, back-up law enforcement will be available from the Oregon State Police, with an office in The Dalles. The moderate number of new temporary construction residents and relatively small number of new permanent residents are not expected to place significant new demands on police in the area. The Sherman County Sheriff 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 (Attachment L-3).

3.3.9 Fire Protection

The Facility will not have an impact on the ability of surrounding communities to provide fire protection and emergency response services during construction or operations. Potential adverse impacts on fire protection services could result if Facility construction or operation or the increased population associated with either caused an increase in fires or other needs for fire protection services beyond the ability of local fire departments to provide those services. During Facility construction, there could be some risk of accidental grass fires on the site due to metal cutting, welding, smoking, refueling vehicles and equipment, and operating or parking vehicles and other equipment off roadways in areas of tall dry grass. Wind turbines and solar panels contain a number of safety features designed to provide increased fire protection. Lithium-ion batteries must be kept in a temperature-controlled facility with individual battery modules isolated to prevent the spread of fire if it were to occur. The lithium-ion BESS will incorporate a fire response system as designed by the battery manufacturer. During the operational phase of the Facility, fire danger will be minimal. See Exhibit M – Wildfire Prevention and Risk Mitigation for further details regarding BMPs for fire management and response, and minimization of fire risk. Measures that could be implemented to minimize fire and safety risks include:

- Fire prevention and response training will be administered to all on-site employees. O&M staff will be trained in the use of fire extinguishers for responding to incipient stage fires on site.
- Hot work (e.g., welding, metal cutting) will be performed in accordance with NFPA 51B and the requirements in the hot work permit issued by the authorized manager for hot work,
- During the dry months of the year, construction vehicles will not be driving on unmowed or unwetted grass, unless such activities are required for emergency purposes, in which case fire precautions will be observed.
- Facility roads will be sufficiently sized for emergency vehicle access.
- Maintenance of defensible space clearance, clear of vegetation around construction sites.
- Areas around Facility infrastructure will be graveled, with no vegetation present.
- A Facility site plan will be submitted to fire protection officials including current contact information for personnel.
- Onsite water storage intended to support emergency response operations will be provided as an additional firefighting resource in the event of a wildfire or Facility-related emergency.
- Adequate firefighting equipment and water supplies will be maintained and made available during operations that carry a high fire risk (e.g., metal cutting, welding, parking in high, dry grass).
- The site will be mowed as needed for fire safety requirements and to keep vegetation from interfering with O&M activities.

- 20-foot noncombustible, defensible space clearance inside fence lines for solar areas and provide an additional 20-foot maintained fire break outside all east-facing fencelines bordering non-participating properties or situated upwind of residences and buildings.
- Smoke/fire detectors will be placed around the site that will be tied to the supervisory control and data acquisition system and will contact local firefighting services.
- Lightning protection systems are built into the wind turbine blades and tower to electrically ground the entire structure and to eliminate the potential for lightning-caused fires.
- Solar modules will have shielded electrical cabling, as required by applicable code, to prevent electrical fires.
- Off-site, 24-hour monitoring of the turbines and BESS will be implemented and will include shutdown capabilities.
- The BESS will be stored in completely contained, leak-proof modules, and will be inspected regularly according to the manufacturer's recommendations.
- Transportation of lithium-ion batteries is subject to 49 CFR 173.185 – Department of Transportation Pipeline and Hazardous Material Administration. This regulation contains requirements for prevention of a dangerous evolution of heat; prevention of short circuits; prevention of damage to the terminals; and prevention of batteries coming into contact with other batteries or conductive materials. Adherence to the requirements and regulations, personnel training, safe interim storage, and segregation from other potential waste streams will minimize any public hazard related to transport, use, or disposal of batteries.
- Design of BESS will be in accordance with applicable Underwriters Laboratories (specifically, 1642, 1741, 1973, 9540A), National Electric Code, and National Fire Protection Association (specifically 855) standards, which require rigorous industry testing and certification related to fire safety and/or other regulatory requirements applicable to battery storage at the time of construction.
- Facility infrastructure will be spaced sufficiently to prevent the spread of fire.
- All electrical equipment will meet National Electrical Code and Institute of Electrical and Electronics Engineers standards.
- An Emergency Response Plan (see Attachment L-6 for a preliminary draft Operations Emergency Response Plan) will be developed with response procedures in the event of an emergency, such as a fire.

Statements from the South Sherman RFPD, Moro RFPD, and Sherman County Emergency Services indicated that they had no concerns with Facility construction or operations with respect to providing fire protection and/or emergency services (see Attachment L-3). As the site boundary is completely within the fire protection districts of South Sherman and Moro, any emergency fire response would be by one of these rural fire protection districts, and any assistance by another fire department would be in the service of one of these rural fire protection districts.

The moderate number of new temporary construction residents and relatively small number of new permanent residents are not expected to place significant new demands on the fire protection forces that serve the area.

3.3.10 Health Care

No significant adverse impacts on the ability of communities to provide health care are anticipated as a result of Facility construction or operation. Impacts to health care could occur if Facility construction activities or increases in temporary residents (during construction) and permanent residents (during operations) resulted in an increase in the use of emergency and routine health care services that exceeded the current capacity of local providers. However, due to the moderate number of new temporary construction residents and relatively small number of new permanent residents, significant new demands are not anticipated to health care facilities that serve the area.

3.3.11 Schools

No significant adverse impacts on the ability of communities to provide school services are anticipated as a result of Facility construction or operation. Construction workers are expected to rotate throughout the duration of Facility construction. As a result, few workers will bring their families with them, and few if any school-aged children are expected in association with Facility construction. Additionally, construction traffic is unlikely to conflict with school bus routes and schedule. Therefore, little to no construction-related impacts on schools will result.

With the assumption that up to 10 new permanent households will result from the Facility, an estimated maximum of 15 new schoolchildren (conservatively assuming 1.5 school-aged children per household) could move to the analysis area. As of 2024, approximately 282 students were enrolled at the Sherman County School (encompasses grades pre-K through 12th grade; Sherman County School District 2026, U.S. News 2026), located within the analysis area. The school can accommodate the addition of 15 students, or slightly greater than a 5 percent increase over the current combined population of 297 students. Additionally, there are multiple other schools that can accommodate new schoolchildren outside the 10-mile analysis area, where some O&M workers are likely to locate. As such, Facility operation is not anticipated to have an adverse impact on schools.

Little to no demand for school facilities is expected during Facility construction, and only minimal demand is anticipated from the small increase in local population from new permanent employees during Facility operations. The actual impact on schools will depend upon the housing choices of the new residents and their children, which are currently unknown. Given the relatively rural, dispersed area in which new residents are likely to settle, the relatively small number of expected new schoolchildren, and the number of schools available, it is unlikely that any one school will receive more new students than they are able to accommodate.

3.4 Monitoring Program – OAR 345-022-0110(4)(a)(E)

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

The Facility will not result in significant adverse impacts to the ability of service providers identified in Section 3.4 to provide services in the analysis area. Therefore, a monitoring program is not proposed.

4.0 Materials Analysis – OAR 345-022-0110(4)(b)

(b) 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.

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

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6.0 Approval Standards and Submittal Requirements

Table L-9. Approval Standards and Submittal Requirements Matrix

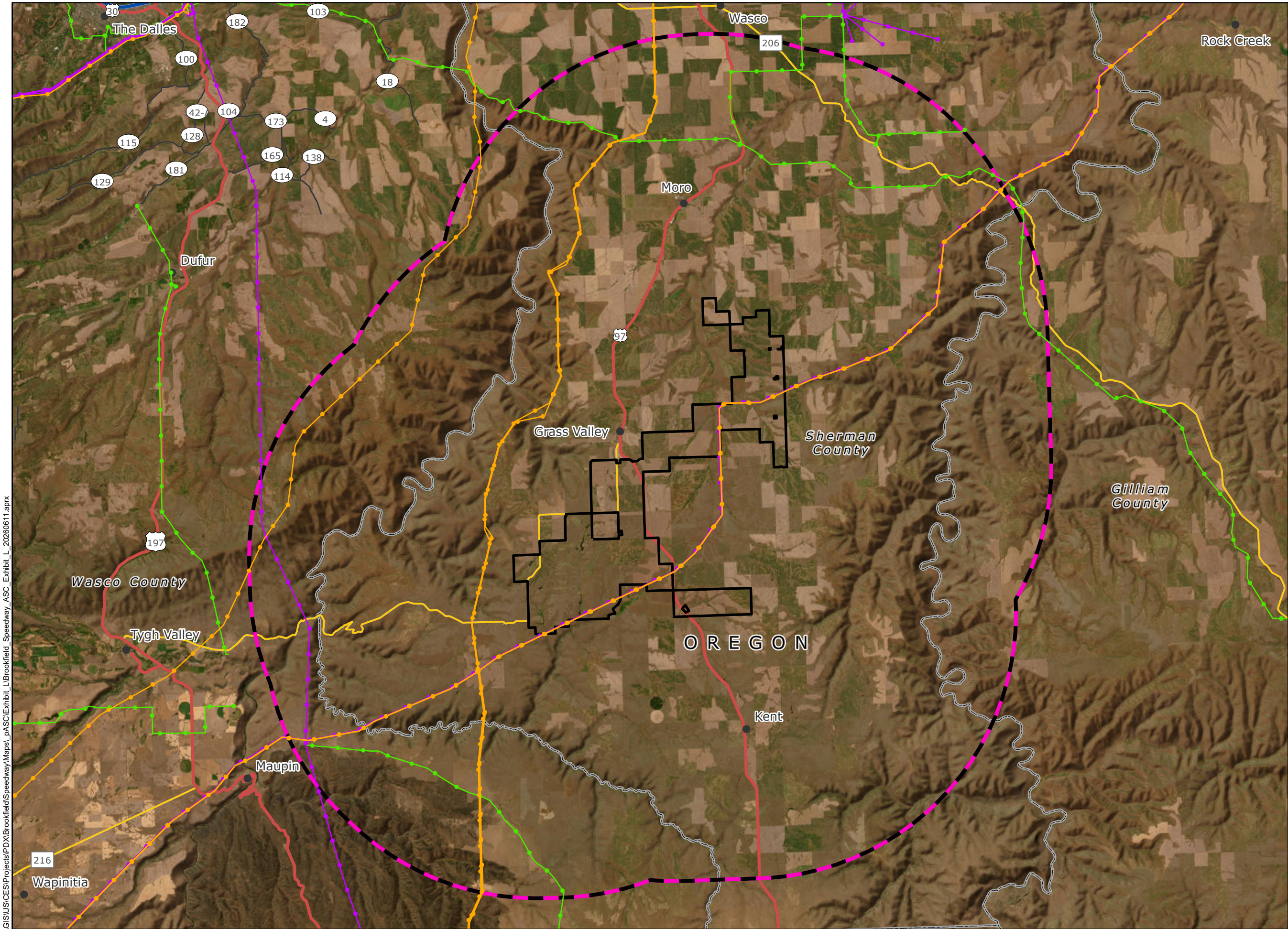
Requirements	Location
OAR 345-022-0110 Public Services	–
Approval Standards	
(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area described in the project order to provide: sewers and sewage treatment, water, storm water drainage, solid waste management, housing, traffic safety, police and fire protection, health care and schools.	Sections 3.0 through 4.0
(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.	N/A
(3) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may	N/A

Preliminary Application for Site Certificate
Exhibit L. Public Services

Requirements	Location
apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.	
Submittal Requirements	
(4) To assist the Council in determining whether the standard outlined in (1) through (3) has been met, the Applicant must submit:	-
(a) Information about significant potential adverse impacts of construction and operation of the proposed facility on the ability of public and private providers in the analysis area to provide the services listed in OAR 345-022-0110, providing evidence to support a finding by the Council as required by OAR 345-022-0110. The applicant must include:	Section 3.0
(A) The important assumptions the applicant used to evaluate potential impacts;	Section 3.1
(B) Identification of the public and private providers in the analysis area that would likely be affected;	Section 3.2
(C) A description of any likely adverse impact to the ability of the providers identified in (B) to provide the services listed in OAR 345-022-0110;	Section 3.3
(D) Evidence that adverse impacts described in (C) are not likely to be significant, taking into account any measures the applicant proposes to avoid, reduce or otherwise mitigate the impacts; and	Section 3.3
(E) The applicant's proposed monitoring program, if any, for impacts to the ability of the providers identified in (B) to provide the services listed in OAR 345-022-0110.	Section 3.4
(b) 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

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Speedway Energy Facility

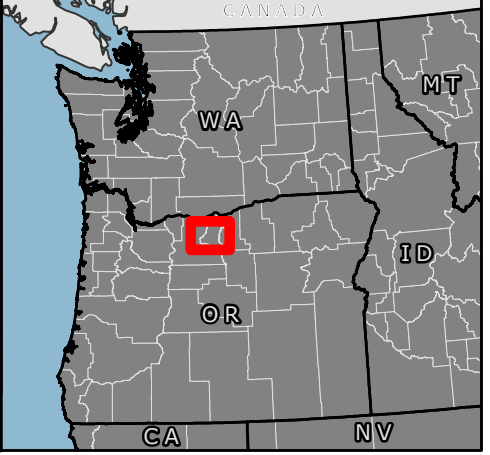
**Figure L-1
Public Services
Analysis Area**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Analysis Area (10 mile buffer)
- City/Town
- County Boundary
- State Boundary
- Interstate Highway
- US Highway
- State Highway
- County Highway
- Transmission Lines**
 - 115 kV Transmission Line
 - 230 kV Transmission Line
 - 500 kV Transmission Line

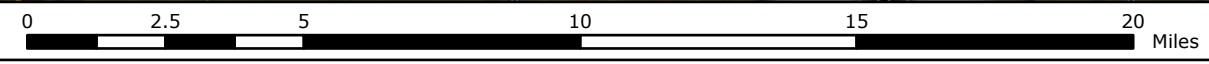


Reference Map

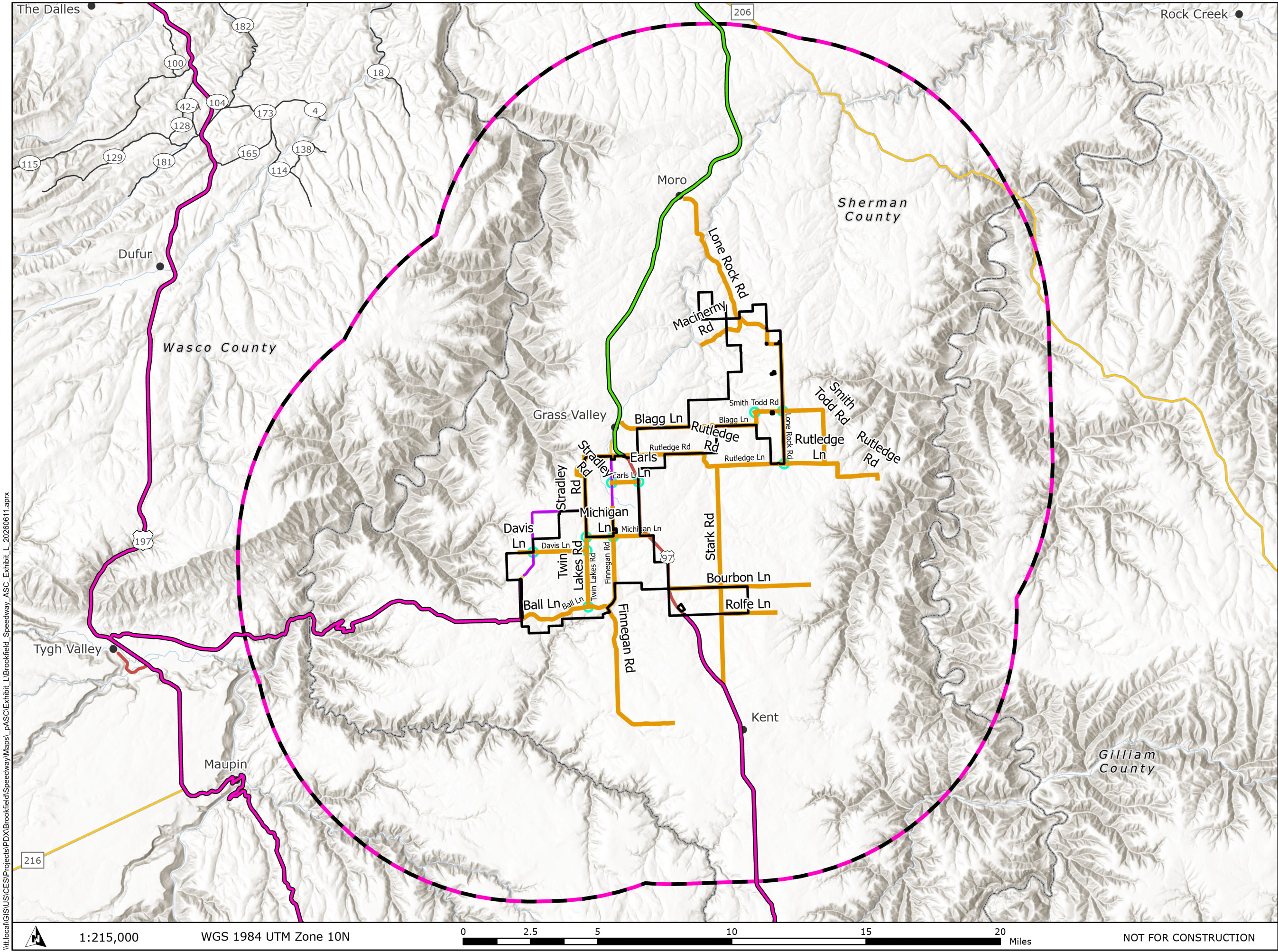


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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION



Speedway Energy Facility

Figure L-2 Construction Transportation Routes

SHERMAN COUNTY, OR

- Facility Site Boundary
- Analysis Area (10 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- County Highway
- Secondary Haul Route
- Primary Haul Route
- Oversize Load Routes
- Local Roads for Worker Traffic
- Proposed Turning Radius Improvements



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Attachment L-1. Speedway Energy Facility Workforce and Housing Availability Analysis

DATE: July 1, 2026
TO: Vincent Esposito, Brookfield Renewable N.A.
FROM: Terry Wirkkala, ECONorthwest
SUBJECT: Speedway Renewable Energy Facility: Workforce and Housing Availability

Executive Summary

BGTF Speedway Project LLC, a subsidiary of Brookfield Renewable N.A. (Brookfield), proposes to construct the 1.4-gigawatt (GW) 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. Construction of the Facility would occur over an anticipated period of approximately 30 months and would require a large, temporary construction workforce.

This report evaluates workforce availability and housing conditions to assess whether local and regional labor markets and housing supply can reasonably accommodate Facility construction. The analysis focuses on the area within an approximately 60-minute commute of the Facility site, which includes Sherman, Wasco, Hood River and Klickitat counties. This geographic area reflects observed commuting patterns for construction workers in the region and represents a reasonable and conservative definition of the local labor and housing market.

Construction Workforce Overview

Facility construction is anticipated to support a peak workforce of approximately 1,049 workers during the construction period. Labor demand spans a range of occupations, including construction laborers, electricians, construction equipment operators, engineers, supervisors, and safety personnel. While some positions are expected to be filled locally, a substantial portion of the construction workforce is anticipated to be recruited from outside the local area due to the scale of the project and the limited size of the local labor market.

Based on an evaluation of occupational labor supply within the defined local area, the analysis estimates that up to approximately 648 construction workers may be non-local at peak construction. This estimate represents a conservative, upper-bound assumption and is intended to reflect maximum potential housing demand associated with Facility construction.

Housing Demand Characteristics

Construction employment associated with the Facility is temporary in nature. Non-local workers are expected to have diverse housing preferences depending on job duration, compensation, and personal circumstances. Workers engaged for shorter periods may favor hotels, motels, or recreational vehicle (RV) accommodations, while workers employed for longer durations may seek rental housing, including apartments or single-family homes. Shared housing arrangements are also common among construction workers, reducing the total number of housing units required.

Assuming all non-local workers require housing within the local area, projected peak housing demand ranges from approximately 648 units assuming single occupancy to approximately 324 units assuming double occupancy. Actual housing demand is expected to fluctuate over the construction period as workers arrive and depart and as housing preferences vary.

Available Housing Supply

The housing availability analysis evaluates three primary housing types within the local area: rental housing, hotel and motel lodging, and RV parks. Across Sherman, Wasco, Hood River, and Klickitat counties, the combined supply of vacant rental units and available transient lodging is estimated at approximately 1,409 units on an annual basis. The majority of available housing is located in Wasco and Hood River counties, while housing supply in Sherman County is more limited.

Rental housing availability is constrained in all three counties, particularly for affordable units; however, rental housing represents only one component of the overall housing market available to construction workers. Transient lodging, including hotels, motels, and RV parks, comprises a larger share of available housing supply and can be used to accommodate temporary construction workforces in rural areas.

Housing Availability Findings

When projected non-local housing demand is compared to available housing supply, the analysis finds that sufficient housing exists within the local area to accommodate Facility construction. Under both single-occupancy and double-occupancy assumptions, housing utilization rates remain below levels that would be anticipated to indicate housing shortages or displacement risk (see Exhibit ES1). These findings indicate that the regional housing market (i.e., area within an approximately 60-minute commute) is expected to be able to absorb construction-related housing demand without substantial adverse effects.



Exhibit ES1: Facility Construction Housing Demand, Supply and Utilization

Housing Scenario	Housing Supply (Annual Units)	Peak Housing Demand	Housing Utilization and Findings
Single Occupancy	Rental housing 275 units Transient lodging 1,134 units Total vacant housing 1,409 units	648 units required	Housing utilization = 46% Vacant housing availability = 2.17 units per worker Surplus housing capacity
Double Occupancy	Rental housing 275 units Transient lodging 1,134 units Total vacant housing 1,409 units	324 units required	Housing utilization = 23% Vacant housing availability= 4.35 units per worker Surplus housing capacity

While housing supply is most constrained in Sherman County, surrounding counties, particularly Wasco County, offer a larger inventory of rental units and transient lodging within a reasonable commuting distance of the Facility site. Seasonal variation in hotel occupancy and RV park availability may affect where workers choose to locate, but overall capacity is sufficient at the regional level.

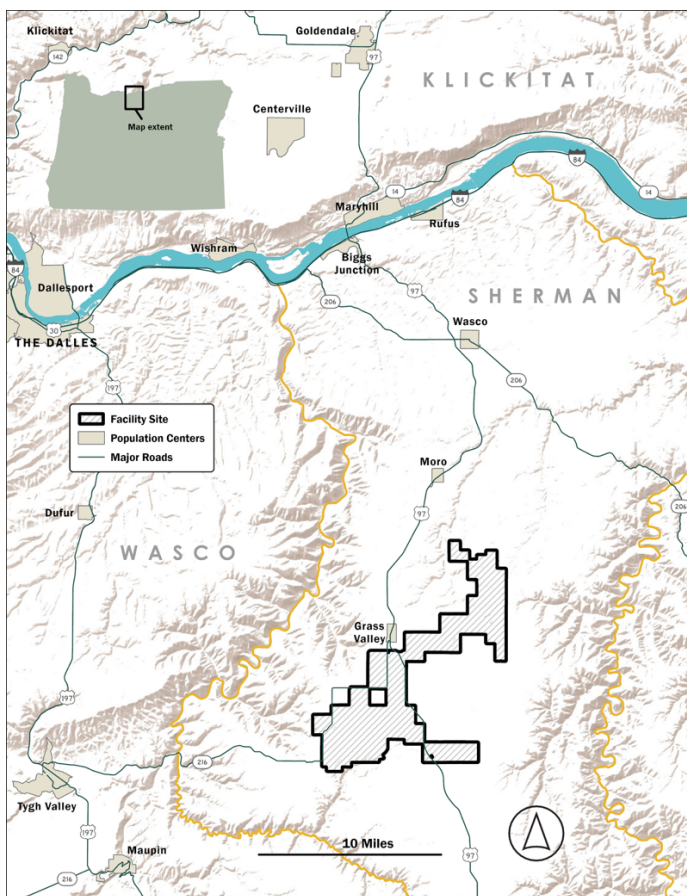
The analysis concludes that, based on current housing conditions and conservative assumptions regarding workforce size and housing demand, adequate housing supply exists within the local area to support construction of the Speedway Energy Facility. Although localized constraints may occur in communities closest to the Facility site, particularly during peak construction periods or summer tourism seasons, the broader regional housing market has sufficient capacity to accommodate temporary construction workers.



Introduction

BGTF Speedway Project LLC, a subsidiary of Brookfield Renewable U.S. (Brookfield) is proposing to construct the 1.4 GW Speedway Energy Facility (Facility) near Grass Valley in Sherman County, Oregon. The Facility includes 1.4 GW of solar and wind resources, an up to 1.4 GW battery energy storage system (BESS) and supporting components (Exhibit 1). This memo details the potential local workforce availability and housing market impacts of Facility construction. This analysis is based on preliminary specifications for the Facility and is presented at a level of detail appropriate for the Facility's early planning stage

Exhibit 1. Speedway Energy Facility Site



Source: BGTF Speedway Project LLC, (Sherman County Assessor's Office, Accessed 2025), (U.S. Census Bureau TIGER/Line Shapefiles, Accessed 2025)

Workforce Availability Analysis

The workforce availability analysis examines how Facility construction employment aligns with the local area labor market to assess whether local workers can meet projected peak labor demand. The analysis addresses three key topics: anticipated construction peak labor



demand by occupational category, the availability of local workers to meet that demand, and the share of workers by occupation expected to be sourced locally versus non-locally.¹

The analysis is based on publicly available data and regional labor market trends; however, future labor market conditions may differ from historical patterns.

Facility Labor Demand

Solar PV and wind energy resource construction requires a combination of skilled and unskilled labor. General construction workers carry out much of the construction and installation work. However, more complex tasks necessitate the involvement of civil engineers, electricians, and specialized construction equipment operators. Additionally, surveyors, health and safety specialists, and construction managers are needed to oversee the construction process. Labor requirements vary by construction phase; however, due to the preliminary nature of the Facility, this analysis assumes peak Facility labor demand throughout the construction period. The Facility is anticipated to support a peak construction workforce of approximately 1,049 workers. This estimate is based on preliminary Facility specifications, and final construction labor requirements may vary as project design and construction planning are refined.

The occupational breakdown of Facility labor demand is presented in Exhibit 2. Facility labor demand is anticipated to include 441 construction laborers (constituting 42 percent of total Facility labor demand), 163 electricians (constituting 16 percent of Facility labor demand), and 121 construction equipment operators (or 12 percent of Facility labor demand). Together these three occupations represent more than two thirds of the total estimated Facility labor demand over the construction period.

¹ See the Local Labor Supply section for the definition of 'local'.



Exhibit 2 Facility Labor Demand Distribution by Occupation

SOC Code	Occupation	Peak Labor Demand	Share of Total Labor Demand
11-9021	Construction Management	61	6%
17-1022	Surveyors	16	2%
17-2051	Civil Engineers	8	1%
19-5011	Health and Safety Specialists	16	2%
43-6014	Secretaries and Administrative Assistants	8	1%
47-1011	Craft Supervision	35	3%
47-2051	Concrete Finishers	7	1%
47-2061	Construction Laborers	441	42%
47-2071	Paving Operators	68	7%
47-2073	Construction Equipment Operators	121	12%
47-2111	Electricians	163	16%
47-2221	Iron Workers	42	4%
47-4011	Construction Inspector/Engineers	22	2%
49-9051	Power Line Installers	41	4%
Total		1,049	100%

Source: BGTF Speedway Project LLC and EConorthwest analysis

Local Labor Supply

Sherman County is the third least populated county in Oregon with a population of 2,002 residents in 2024, a 7.3 percent increase from the 1,870 residents in 2020 (U.S. Census Bureau, Accessed 2025). In 2024, employment in the County totaled 965 employees, with a median household income of \$59,500, which is well below the statewide median household income of \$80,426 (U.S. Census Bureau, Accessed 2025). County employment was focused in retail trade (13.6 percent) and professional, scientific and technical services (13.3 percent) as the largest employment sectors, followed by public administration (8.3 percent) and construction (8.0 percent) (U.S. Bureau of Labor Statistics, 2024 (a)).

Workers in rural regions like Sherman County typically commute longer distances to job sites than those in urban centers; furthermore, construction workers routinely travel farther for work than employees in most other occupations. Thus, the relevant labor market for quantifying the potential local labor supply for Facility construction extends beyond Sherman County and the towns surrounding the Facility site.

To estimate willingness to travel for workers who live in the area, the average commute time to job sites within the US Census Bureau American Community Survey (ACS) geography including Sherman County is computed for the types of occupations for which demand is greatest over the course of Facility construction including construction laborers, electricians, and construction equipment operators. Exhibit 3 presents the distribution of commuting times for the selected occupations for job sites in the Sherman County census micro



geography (U.S. Census Bureau, 2024). Roughly 88 percent of workers in the selected occupations travel 60 minutes or less to job sites in Sherman County, with 53 percent of workers commuting less than 30 minutes and 35 percent commuting between 30 and 60 minutes. Roughly 12 percent of workers in the selected occupations commute over 60 minutes to job sites in Sherman County.

Exhibit 3. Commute Time to Work for Workers in Relevant Construction Occupations

Drive Time	Share
0-30 minutes	53%
30-60 minutes	35%
60+ minutes	12%

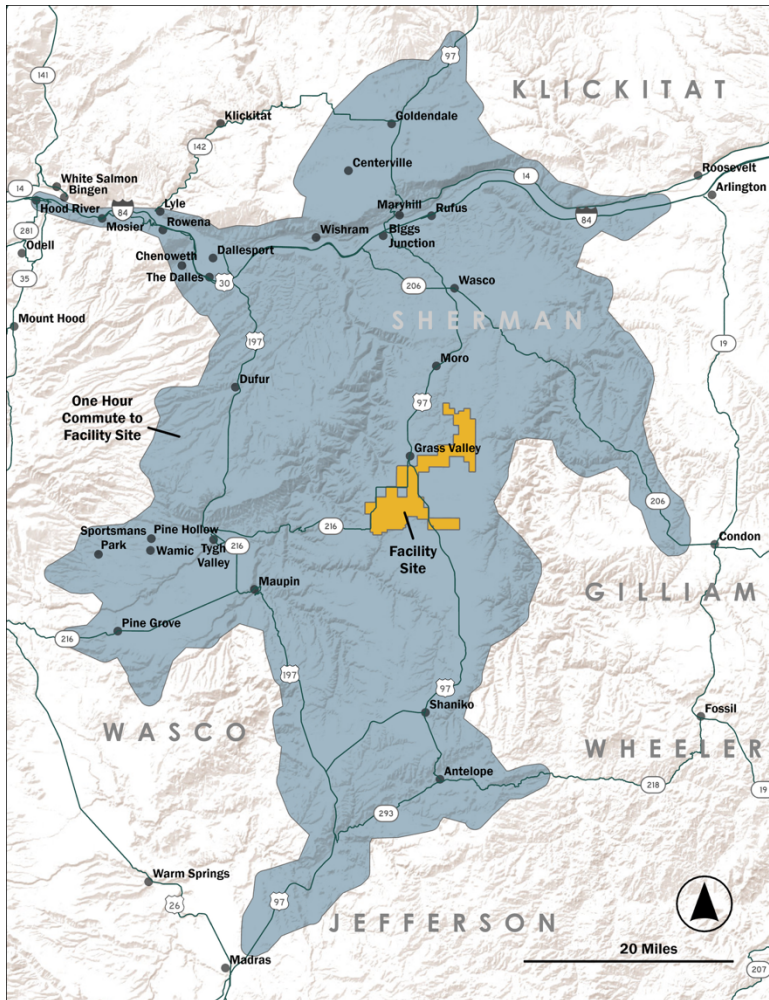
Source: (U.S. Census Bureau, 2024)

Note: Data has a relatively wide margin of error so commute time estimates could be +/- 60 percent.

The data suggests that defining a labor market geography with a typical drive time of approximately 60 minutes to the Facility site is not unreasonable in this region for the types of workers that the Facility would employ. This 60-minute commute time includes all or part of Sherman, Wasco, Hood River, and Klickitat Counties. Although portions of other counties fall within the one-hour drive time, due to the presence of populated areas, only Sherman, Wasco, Hood River and Klickitat counties are included in the local area for the local labor market. The geographic extent of the local labor market based on the approximate 60-minute drive time is presented Exhibit 4. Because approximately 12 percent of Sherman County workers in relevant occupations commute more than 60 minutes to job sites, and because a 60-minute commute includes portions of surrounding counties, the 60-minute drive-time boundary likely represents a conservative estimate of the labor market available for Facility construction.



Exhibit 4. Geographic Extent of the Local Labor Market



Source: (Sherman County Assessor's Office, Accessed 2025) (U.S. Census Bureau TIGER/Line Shapefiles, Accessed 2025) (Google Maps, Accessed 2025) (Mapbox, Accessed 2025), EConorthwest analysis

The commuting patterns of workers to job sites in Sherman County are presented in Exhibit 5. Over two thirds of workers commuting to job sites within Sherman County reside in Sherman and Wasco Counties, with additional workers commuting from as far as Multnomah and Umatilla Counties. The commuting patterns of existing Sherman County workers underscore the willingness of workers to commute long distances to job sites in Sherman County.

Exhibit 5. Share of Sherman County Workers by Home County

Home County	Share of Sherman County Workers by Home County
Sherman County, Oregon	45%
Wasco County, Oregon	22%
Umatilla County, Oregon	6%
Multnomah County, Oregon	5%
Other Oregon Counties	23%
Total	100%

Source: (U.S. Census Bureau, 2025)

The existing workforce in each occupation relevant to Facility construction is estimated within the local area to characterize the local labor supply. Two data sources are used in this analysis: data from the Bureau of Labor Statistics (BLS) and the 2023 Impact Analysis for PLANning (IMPLAN) model. The use of multiple data sources reflects their respective strengths in accuracy and geographic coverage, as discussed below.

The 2024 BLS Occupational Employment and Wage Statistics Survey (BLS OEWS) data provides estimates of total employment for metropolitan and nonmetropolitan statistical areas. The Central Oregon nonmetropolitan area, which includes Sherman, Hood River, and Wasco counties is presented in Exhibit 6 (U.S. Bureau of Labor Statistics, 2024). Across this BLS geography, there are approximately 1,910 workers in relevant occupations (U.S. Bureau of Labor Statistics, 2024). The BLS geography for the Central Oregon nonmetropolitan area contains other counties in addition to Sherman, Hood River and Wasco counties, thus, the figures presented in Exhibit 6 likely overestimate the relevant labor market for the Facility but still provide a reasonable upper bound.

Klickitat County is included within the Eastern Washington nonmetropolitan area; however, this BLS geography covers a broad range of counties in Washington stretching up to Okanogan and Ferry counties along the Canadian border. Although Klickitat County is included in this BLS geography, employment estimates for the Eastern Washington nonmetropolitan area are not included in the analysis since it would overestimate the Facility's likely labor market.



Exhibit 6. Employment by Occupation and Region (2024)

SOC Code	Occupation	Central Oregon
11-9021	Construction Management	80
17-1022	Surveyors	0
17-2051	Civil Engineers	110
19-5011	Health and Safety Specialists	40
43-6014	Secretaries and Administrative Assistants	660
47-1011	Craft Supervision	180
47-2051	Concrete Finishers	50
47-2061	Construction Laborers	350
47-2071	Paving Operators	0
47-2073	Construction Equipment Operators	180
47-2111	Electricians	170
47-2221	Iron Workers	0
47-4011	Construction Inspector/Engineers	0
49-9051	Power Line Installers	90
Total		1,910

Source: (U.S. Bureau of Labor Statistics, 2024)

Note: Klickitat County, Washington, is excluded from this estimate because its BLS labor market region encompasses 12 counties and a large geographic area extending to the Canadian border, which would likely overestimate the workforce available to support the Project.

Although BLS OEWS is generally considered the most accurate and reliable source of publicly available occupational employment data, the issues presented by its geographic boundaries introduce a need for a second, more geographic-specific data source. County-level occupational employment figures from IMPLAN (see Exhibit 7) are provided to supplement the employment estimates above. IMPLAN data suggests there are 1,295 workers in relevant occupations within the four-county local area (IMPLAN, 2023).



Exhibit 7. Employment by Occupation and County (2023)

SOC Code	Occupation	Sherman	Wasco	Hood River	Klickitat	Four-County Total
11-9021	Construction Management	5	30	39	16	90
17-1022	Surveyors	0	1	11	2	14
17-2051	Civil Engineers	2	14	60	14	91
19-5011	Health and Safety Specialists	1	7	10	7	25
43-6014	Secretaries and Administrative Assistants	11	127	143	97	377
47-1011	Craft Supervision	8	53	62	34	157
47-2051	Concrete Finishers	1	8	11	7	27
47-2061	Construction Laborers	12	76	94	45	227
47-2071	Paving Operators	0	3	3	2	9
47-2073	Construction Equipment Operators	4	29	30	23	86
47-2111	Electricians	3	22	26	33	83
47-2221	Iron Workers	0	3	3	2	9
47-4011	Construction Inspector/Engineers	1	8	17	6	32
49-9051	Power Line Installers	1	25	14	28	68
Total	Total	52	406	521	316	1,295

Source: (IMPLAN, 2023)

The relevant occupations with the fewest regional workers across both datasets are surveyors, paving operators, and iron workers. The occupations with the most regional workers across both datasets include secretaries and administrative assistants, construction laborers and craft supervision. The local labor supply (LLS) is estimated as the average of the figures from both datasets (Exhibit 6 and Exhibit 7) and is presented in Exhibit 8. These estimates represent the amount of labor generally available within a reasonable commuting time to the Facility site.



Exhibit 8. Estimated Local Labor Supply

SOC Code	Occupation	Local Labor Supply
11-9021	Construction Management	93
17-1022	Surveyors	8
17-2051	Civil Engineers	108
19-5011	Health and Safety Specialists	36
43-6014	Secretaries and Administrative Assistants	567
47-1011	Craft Supervision	185
47-2051	Concrete Finishers	42
47-2061	Construction Laborers	311
47-2071	Paving Operators	5
47-2073	Construction Equipment Operators	144
47-2111	Electricians	143
47-2221	Iron Workers	6
47-4011	Construction Inspector/Engineers	19
49-9051	Power Line Installers	93
Total		1,760

Source: (IMPLAN, 2023) (U.S. Bureau of Labor Statistics, 2024)

The estimate of the available local labor supply is based on a static snapshot of current occupational employment and is likely a conservative estimate of the labor pool available for Facility construction. This approach does not account for dynamic labor response, such as workers reskilling or retraining in response to new job opportunities. Local project announcements can incentivize transition into construction-related trades required by wind and solar facilities. Although there is no research directly examining the impact of renewable energy projects on workforce reskilling, recent data from the Department of Labor shows a 43 percent increase in registered apprenticeships served in the energy industry from 2020 through 2024 (U.S. Department of Labor , Accessed 2025). Additionally, a 2022 National Laboratory of the Rockies² survey of wind energy firms found that construction occupations saw the greatest decline in hiring difficulty for entry-level workers between 2020 and 2022 (McDowell, Stefek , Smith, Pons, & Ahmad, 2024).

Workforce Availability Analysis

The previous sections establish both the Facility’s anticipated peak labor demand and the local labor supply within a 60-minute commute of the Facility. Comparing the two indicates that only one occupation could be filled locally, as the Facility would require only a small share of the available workforce. In other cases, while the local labor supply exceeds the

² The National Laboratory of the Rockies was named the National Renewable Energy Laboratory at the time of publication.



Facility's demand, many of these workers would likely be employed, making it unlikely that enough could be drawn away from existing jobs to fulfill Facility peak labor demand. For other occupations, the local labor supply is smaller than the Facility's demand, meaning a substantial share of workers will need to be recruited from outside the local area.

Facility labor demand for relevant occupations compared with the local labor supply is presented in Exhibit 9. This comparison yields the local labor supply utilization rate, defined as the percentage of the local labor supply that would be utilized by Facility construction. The utilization rate for each relevant occupation is compared with the population-weighted average regional unemployment rate, 4.5 percent in this case, to estimate the share of the workforce potentially available for Facility work. The shading in Exhibit 9 highlights where the local labor supply utilization exceeds the following thresholds:

GREEN indicates a surplus of available local workforce to meet Facility peak labor demand. Construction of the Facility would utilize less than the current population-weighted average regional unemployment rate of 4.5 percent (U.S. Bureau of Labor Statistics, 2024).

YELLOW indicates close to adequate available local workforce to meet Facility peak labor demand. This category indicates where construction of the Facility would utilize a share of the local labor supply that falls between 4.5 percent (the population-weighted unemployment rate in the region) and 9.0 percent (twice the unemployment rate). Please note that no occupations fall within this category.

ORANGE indicates a shortage of available local workforce to meet Facility peak labor demand. Construction of the Facility would utilize over 9.0 percent (twice the unemployment rate) of the local labor supply.

The Facility local labor supply utilization rate for each relevant construction occupation is presented in Exhibit 9, with color highlighting to show where they exceed these key thresholds. As indicated by the orange highlighting, there is insufficient local labor supply to meet most of the peak Facility labor demand.



Exhibit 9. Facility Peak Labor Demand as Percentage of Local Labor Supply

SOC Code	Occupation	Peak Facility Labor Demand	Local Labor Supply	Local Labor Supply Utilization
11-9021	Construction Management	61	93	66%
17-1022	Surveyors	16	8	>100%
17-2051	Civil Engineers	8	108	8%
19-5011	Health and Safety Specialists	16	36	44%
43-6014	Secretaries and Administrative Assistants	8	567	1%
47-1011	Craft Supervision	35	185	19%
47-2051	Concrete Finishers	7	42	16%
47-2061	Construction Laborers	441	311	>100%
47-2071	Paving Operators	68	5	>100%
47-2073	Construction Equipment Operators	121	144	84%
47-2111	Electricians	163	143	>100%
47-2221	Iron Workers	42	6	>100%
47-4011	Construction Inspector/Engineers	22	19	>100%
49-9051	Power Line Installers	41	93	45%
Total		1,049	1,760	

Source: ECONorthwest analysis

Assessment of local labor availability depends on factors other than the number of workers in a particular occupation including compensation, benefits, perks, licensing requirements, working conditions, competing job opportunities, and overall economic conditions. These conditions influence workers' decisions regarding whether to accept one job over another. Some of these factors, such as compensation, are within the employer's control, while others, like competing opportunities and general economic conditions, are beyond employer's influence.

Another factor that may influence local versus non-local shares of workers is where the contractor hired to manage the project is located and their preference for hiring. Although renewable projects may sometimes utilize some non-labor workforce, recent research from Lawrence Berkeley National Laboratory shows that large scale wind projects increase local employment (Gilbert, Hoen, & Gagarin, 2024). Along with the increase in local employment, the research also finds evidence of an increase in incomes within 20 miles of the wind project, both of which begin with project construction last for many years after.

Given that most of the factors discussed above cannot be characterized, the analysis of local workforce availability in Exhibit 10 relies on certain assumptions identified by the color highlights:

GREEN For all occupations with a surplus of available local workforce (cells in green in Exhibit 9), we assume that the Facility **will be able to hire sufficient workers locally to fill all positions** throughout the construction period.



YELLOW For all occupations with Facility demand above the unemployment rate (4.5 percent), but below twice the unemployment rate (cells in yellow in Exhibit 9), the analysis assumes that the Facility could have adequate influence to hire close to 100 percent if managers provide sufficient incentives. However, to provide a conservative assessment, this analysis **assumes the facility can hire locally up to 75 percent of its peak labor demand locally**.

ORANGE For occupations with a shortage of available local workforce (cells in orange in Exhibit 9 showing a utilization greater than twice the unemployment rate), the analysis assumes that the Facility could hire a substantial number from the local region with sufficient incentives, but not 100 percent given the high numbers of workers needed and compared to the local labor supply. In this case, the analysis **assumes that the Facility can hire up to 50 percent of its peak labor demand locally**. The rest of the workforce will come from outside the local area.

Applying these assumptions to the peak labor demand results in an estimated maximum of 648 non-local construction workers as presented in Exhibit 10. The actual number of non-local workers may be lower as labor needs shift over the course of construction. This estimate represents the maximum increase in the number of temporary households in the local area due to the Facility. This figure is the basis of the housing analysis in the next section.

Exhibit 10. Estimated Facility Workforce: Local and Non-Local Workers

Soc Codes	Occupation	Peak Labor Demand	Local Labor		Non-Local Labor	
			Workers	Percent	Workers	Percent
11-9021	Construction Management	61	31	50%	31	50%
17-1022	Surveyors	16	4	26%	12	74%
17-2051	Civil Engineers	8	6	75%	2	25%
19-5011	Health and Safety Specialists	16	8	50%	8	50%
43-6014	Secretaries and Administrative Assistants	8	8	100%	0	0%
47-1011	Craft Supervision	35	18	50%	18	50%
47-2051	Concrete Finishers	7	3	50%	3	50%
47-2061	Construction Laborers	441	156	35%	285	65%
47-2071	Paving Operators	68	3	4%	66	96%
47-2073	Construction Equipment Operators	121	60	50%	60	50%
47-2111	Electricians	163	72	44%	91	56%
47-2221	Iron Workers	42	3	7%	39	93%
47-4011	Construction Inspector/Engineers	22	10	45%	12	55%
49-9051	Power Line Installers	41	21	50%	21	50%
Total		1,049	401	38%	648	62%

Source: EConorthwest analysis

Housing Availability Analysis

The housing availability analysis focuses on the housing supply within a reasonable commuting distance from the Facility site of 60-minutes. The establishment of this boundary is supported by evidence presented in the Local Labor Supply section regarding relevant



commute times. The demand for housing is based on the number of non-local workers required for Facility construction. The workforce availability analysis estimates that the Facility may hire roughly two-thirds of its construction workforce from outside the local area or 648 workers, creating an increase in demand for temporary housing in the local area.

Construction employment is typically short-term, with most workers unlikely to relocate permanently. However, due to the length of Facility construction, 30 months, some workers engaged for the full construction period may prefer longer-term housing opportunities such as rental housing. Therefore, the analysis focuses on all relevant rental housing types: rental housing, hotel/motel lodging, and RV parks.

Facility Housing Demand

The workforce availability analysis projects that Facility construction will generate a maximum housing demand for approximately 648 workers. Since personnel may arrive and depart throughout the project, housing needs will vary across the construction period. Workers employed throughout the anticipated 30-month construction period may prefer renting a house or apartment, while those hired for shorter or intermittent periods may favor hotels, motels, or RV sites, potentially staying during the workweek and returning home or traveling elsewhere on weekends.

Not all workers will require private accommodations—shared housing arrangements are common in construction, reducing overall unit demand. If all non-local workers shared housing in pairs, the 648 workers would require an average of 324 rental housing units (see Exhibit 11).

Exhibit 11. Estimated Peak Facility Housing Demand, in Annual Units

Facility Housing Demand	
Single Occupancy	648
Double Occupancy	324

Source: ECONorthwest analysis

Local Housing Supply

Rental Housing

Construction of the Facility would attract non-local workers with diverse housing needs. Rental housing offers a short-term, stable, and flexible living arrangement. This includes houses, apartments, mobile homes, groups of rooms, and single rooms (US Census Bureau, 2025). Dormitories, transient quarters like hotels/motels, and RVs are excluded from this category.



Central and Eastern Oregon face an affordable housing shortage with a deficit of 856 units for households earning at or below 30 percent of the median income in the area in 2022 (Mid Columbia Houseless Collaborative, 2023). The shortage of rental housing, particularly affordable rental housing, in and around the Facility area may present a challenge for non-local workers at specific phases of Facility build-out. In addition, competing demand for available housing may further limit the available housing supply identified in this analysis.

Exhibit 12 summarizes rental housing stock within the Facility commuting area including Sherman, Wasco, Hood River, and Klickitat Counties and presents the estimated number of vacant rental units from the 2023 American Community Survey 5-year estimates.³ Rental housing in all four counties is limited, though rental housing units make up close to or more than half the housing stock in certain communities, such as Tygh Valley, Rowena in Wasco County, Hood River City in Hood River County and Lyle in Klickitat County. Sherman County has approximately 9 vacant rental units, Wasco County approximately 86 vacant units, Hood River approximately 120 vacant units, and Klickitat County approximately 60 vacant units (U.S. Census Bureau, 2024).

³ For less densely populated area, ACS estimates may have higher margins of error.



Exhibit 12. Regional Rental Housing Stock, in Annual Units

Location	Total Housing Units	Rental Housing as a % of Housing	Rental Vacancy Rate	Vacant Rental Units
Sherman County, OR	979	27%	3%	9
Wasco	240	24%	0%	0
Moro	183	36%	0%	0
Rufus	141	19%	7%	2
Other towns, cities, and CDPs	415			7
Wasco County, OR	12,102	31%	2%	86
The Dalles	6,812	38%	2%	62
Chenoweth	696	30%	9%	19
Pine Hollow CDP	561	1%	0%	0
Other towns, cities, and CDPs	4,033			5
Hood River County, OR	10,210	30%	4%	120
Hood River City	4,037	44%	6%	108
Cascade Locks	757	21%	7%	12
Odell CDP	735	11%	0%	0
Other towns, cities, and CDPs	4,681			0
Klickitat County, WA	10,722	23%	2%	60
Goldendale City	1,797	43%	3%	21
White Salmon City	1,380	27%	4%	16
Dallesport CDP	612	28%	0%	0
Trout Lake CDP	376	16%	0%	0
Other towns, cities, and CDPs	6,557			23
Total	34,013			275

Source: (U.S. Census Bureau, 2024), ECONorthwest analysis

Hotels/Motel Lodging

This analysis examines the hotel market within the region encompassing all of Sherman, Wasco, Hood River and Klickitat counties. STR hotel performance data from the CoStar Group, covering the period from January 2017 through May 2025, indicates that there are 39 active hotel properties in the region. STR provided actual performance data (room supply, room sales, and revenue) for 44 percent of the total room inventory, and generated estimates for the remaining 56 percent (CoStar Group, 2025). This analysis incorporates STR's data and estimates for all 39 hotels.

The market is heavily weighted toward economy and midscale hotels, which account for 74 percent of the total room supply. The remainder includes upscale hotels and two luxury hotels. There are 1,958 rooms in the four-county market. In the twelve months from June 2024 to May 2025 the occupancy rate (percent of room nights available sold) was 66.6



percent. The average daily rate (ADR) or rate paid per night excluding taxes and extras was \$148.

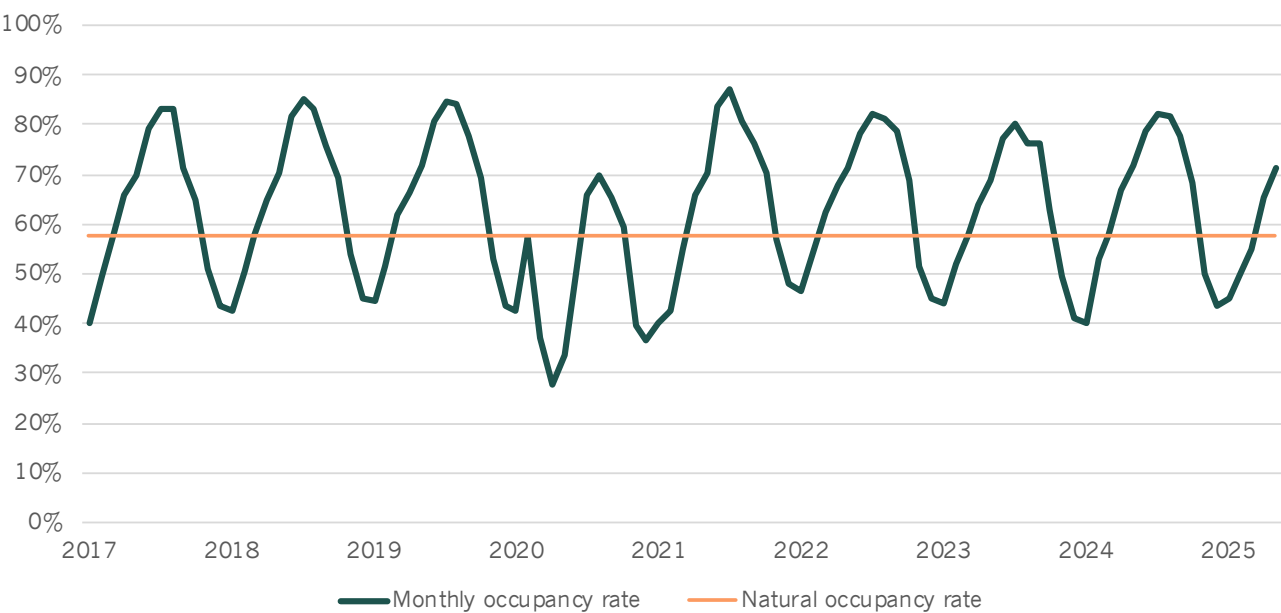
Over the period from May 2020 to May 2025, there has been a small increase of 0.74 percent in supply growth, while demand has been rising at a 2.8 percent annual rate. Room rates have been increasing 0.7 percent a year above inflation.

NATURAL OCCUPANCY RATE

Current market conditions are not predictive of future conditions. When analyzing hotel markets more than a year or two into the future, it is necessary to determine the occupancy rate at which long-run supply and demand are in balance. This is called the natural occupancy rate and is calculated by economists using a regression analysis of historical data (deRoos, 1999).

Exhibit 13 illustrates the monthly market occupancy rate since January 2017 compared to the market’s natural occupancy rate. Using regression analysis on the historical data from STR, we estimate the natural occupancy rate for the region to be 57.5 percent. The actual rate in the period from June 2024 to May 2025 was 66.6 percent, suggesting the market was undersupplied and could absorb additional rooms. An addition of 301 rooms, an increase of 16 percent, would bring the market into balance.

Exhibit 13. Natural and Actual Hotel Occupancy Rate in the Raceway market, January 2017 – May 2025



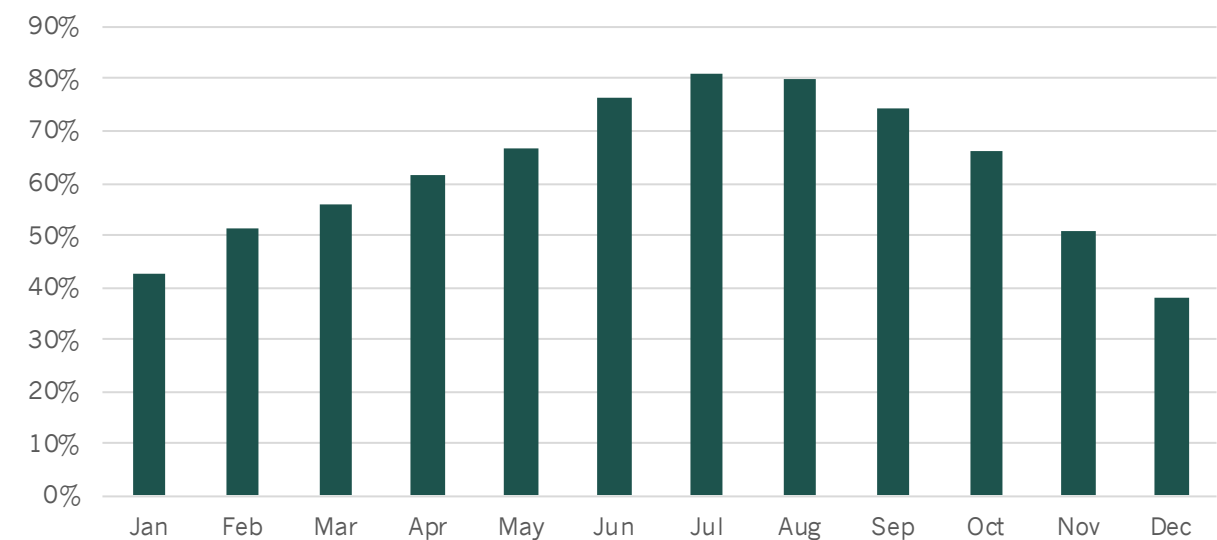
Source: (CoStar Group, 2025), ECONorthwest analysis

Demand for hotel and motel rooms in this area is seasonal, as illustrated in Exhibit 14. The local area occupancy rates peak in the summer months of July and August when about 80



percent of the rooms are sold each day. The lowest occupancy is in the winter months of December and January when less than half of the rooms are sold each day. During the shoulder seasons (spring and fall), occupancy averages just over 60 percent.

Exhibit 14. Average Monthly Hotel Occupancy Rates in Sherman, Wasco and Hood River Counties, January 2017 – May 2025



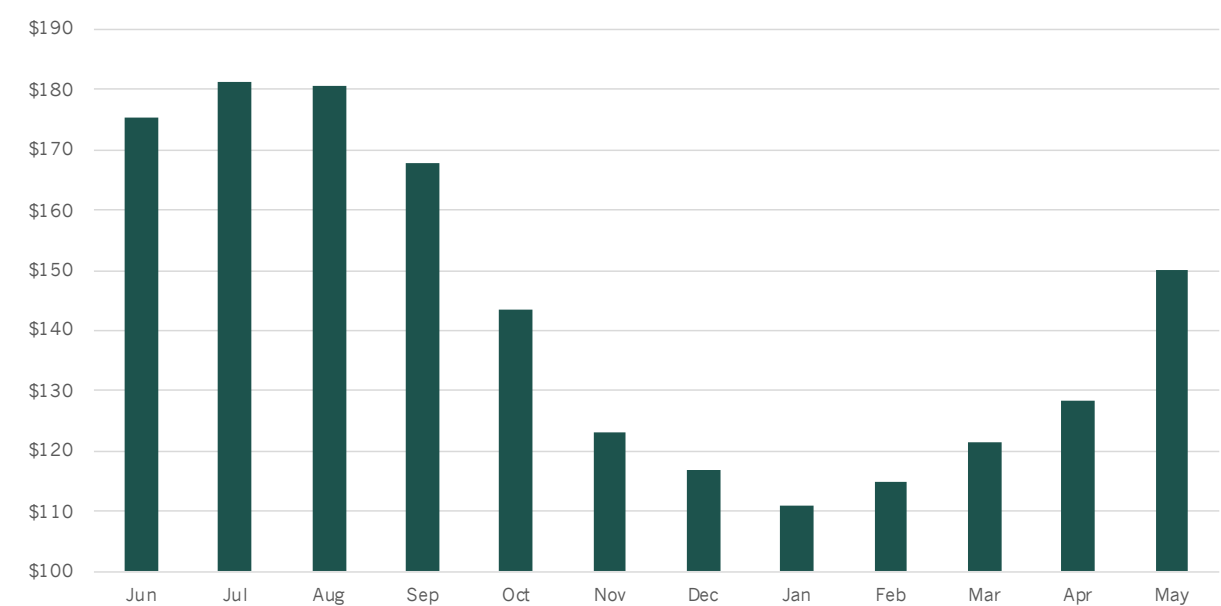
Source: (CoStar Group, 2025), ECONorthwest analysis

During the shoulder and off-season months, vacancies run between 270 and 993 rooms a day (CoStar Group, 2025). A common practice for large construction projects in sparsely populated areas is to negotiate with local economy hotels to provide temporary housing for construction workers. Many of the hotels in the area are economy and/or mid-tier and may be amenable to contracting to provide temporary worker housing outside of the peak summer months.

Average daily rates (ADRs), shown for the period from June 2024 to May 2025 in Exhibit 15, are sensitive to occupancy rates. From June through September, ADRs consistently exceeded \$165 per night, reflecting peak summer season. However, rates dropped sharply as the season ended, dipping to under \$125 per night from November through April. For most hotels in the region, the summer months are critical for annual profitability.



Exhibit 15. Average Daily Rate in the Area, June 2024 – May 2025



Source: (CoStar Group, 2025), ECONorthwest analysis

RV Parks

RV sites with full hookups and dump station access are a viable housing option for construction workers due to their convenience and affordability. Full hookups facilitate provide access to water, electricity, and sewage, while dump stations help maintain a hygienic environment with a convenient means of waste disposal. Many non-local construction workers travel with an RV to stay near a job site.

Based on a review of online sources, there are 22 RV parks within Sherman, Wasco, and Klickitat Counties, with roughly 703 individual RV sites. The RV parks in Hood River County lie primarily outside of a 60-minute drive time to the Facility and were not included in the analysis. Of the parks with publicly available fee information, monthly rates range from \$450 to \$1,740. Nearly all the mobile home and RV parks offer full hookups, and about two-thirds offer dump stations (see Exhibit 16). Some parks do not explicitly list these amenities on their websites, although they may still provide them.



Exhibit 16. Regional RV Park Capacity and Amenities by Distance to Facility

Location	Total RV Parks	% of Sites with Full Hookups	% of Sites with Dump Stations
0 – 30 minutes	4	100%	50%
30 – 60 minutes	18	89%	56%
Total (Average)	22	(94%)	(53%)

Source: (Goldendale RV Park, 2024) (Grass Valley RV, 2024) (Hunt Park, 2024) (RV LIFE, 2024) (Peach Beach Camp Park, 2024) (Sherman County, 2024) (Washington State Parks, 2024) (South Wasco Fire & Rescue, 2024) (Two Crows Housing, 2024) (RVparking, 2024) (City of Maupin, 2024) (Stargazers RV Resort, 2024) (RV Parky, 2024) (RV LIFE, 2024) (Rufus RV Park, 2024) (Chinook RV Park, 2025) (UpRiver RV Park, 2025) (Peach Beach RV Park, 2026; Stargazers RV Resort, 2026; Goldendale RV Park, 2026; RV Life, 2026; Two Crows Housing, 2026; Washington State Parks, 2026)

Note: RV sites in Hood River County lie primarily outside of the 60-minute drive time area and were not evaluated as part of this work.

Based on interviewed RV Parks, annual occupancy rates average around 58 percent, ranging from 15 to 100 percent depending on the season.⁴ Summer occupancy rates tend to be higher than those observed in winter. One RV Park that was interviewed as part of this work primarily serves solar and wind farm workers, with occupancy rates dependent on the status of projects in the area. Accounting for the average annual occupancy rate, an estimated 267 RV sites are vacant within a 60-minute commute time of the Facility site.

Exhibit 17. Regional RV Park Inventory

Location	Total RV Parks	Total RV Sites	Vacant RV Sites	Average Monthly Rate
Sherman County, OR	4	99	53	\$450 to \$795
Wasco County, OR	12	299	123	\$525 to \$1,705
Klickitat County, WA	6	305	92	\$550 to \$1,740
Total	22	703	267	\$450 to \$1,740

Source: (Goldendale RV Park, 2024) (Grass Valley RV, 2024) (Hunt Park, 2024) (RV LIFE, 2024) (Peach Beach Camp Park, 2024) (Sherman County, 2024) (Washington State Parks, 2024) (South Wasco Fire & Rescue, 2024) (Two Crows Housing, 2024) (RVparking, 2024) (City of Maupin, 2024) (Stargazers RV Resort, 2024) (RV Parky, 2024) (RV LIFE, 2024) (Rufus RV Park, 2024) (Chinook RV Park, 2025) (UpRiver RV Park, 2025) (Peach Beach RV Park, 2026; Stargazers RV Resort, 2026; Goldendale RV Park, 2026; RV Life, 2026; Two Crows Housing, 2026; Washington State Parks, 2026)

Note: RV parks identified within Hood River County fall outside of a 60-minute commute of the Facility site so are excluded from this analysis.

⁴ Interviews were conducted with a selection of RV parks.



Summary of Available Housing Supply

The available housing supply is summarized by type and location in Exhibit 18. Housing supply is most constrained in Sherman County. In all counties, the supply of transient housing is larger than the supply of rental housing. Of the three counties, Wasco County offers the largest amount of available lodging, followed by Hood River County, Klickitat County and then Sherman County. The available housing supply is estimated at 1,409 annual units.

Exhibit 18. Summary of Available Housing Supply, in Annual Units

Location	Rental Housing Units	Hotel/Motel Rooms	RV Sites	Total Vacant Housing Units
Sherman County, OR	9	51	53	113
Wasco County, OR	86	490	123	698
Hood River County, OR	120	239		359
Klickitat County, WA	60	87	92	239
Total	275	866	267	1,409

Source: (CoStar Group, 2025) (Chinook RV Park, 2025) (UpRiver RV Park, 2025) (Goldendale RV Park, 2024) (Grass Valley RV, 2024) (Hunt Park, 2024) (RV LIFE, 2024) (Peach Beach Camp Park, 2024) (Sherman County, 2024) (Washington State Parks, 2024) (South Wasco Fire & Rescue, 2024) (Two Crows Housing, 2024) (RVparking, 2024) (City of Maupin, 2024) (Stargazers RV Resort, 2024) (RV Parky, 2024) (RV LIFE, 2024) (Rufus RV Park, 2024) (Peach Beach RV Park, 2026; Stargazers RV Resort, 2026; Goldendale RV Park, 2026; RV Life, 2026; Two Crows Housing, 2026; Washington State Parks, 2026)

Note: RV sites in Hood River County lie primarily outside of the 60-minute drive time area and were not evaluated as part of this work.

Housing Availability Impacts

Large construction projects can introduce a temporary increase in housing demand as non-local workers relocate to the area over the course of construction, potentially drawing from the existing stock of vacant rental units. This analysis focuses on the relationship between projected non-local worker housing demand and the current inventory of vacant rental units as an indicator of the degree to which Facility construction-related labor demand may strain local rental housing availability.

Vacant rental housing supply within a reasonable commute to the Facility site (i.e. the local area) includes 275 units of rental housing and 1,134 units of transient lodging (i.e. hotel, motel, and RV sites), for a total of 1,409 housing units annually (see Exhibit 18). The potential increase in short term and transient housing demand in the local area due to Facility construction is estimated at a maximum of 648 households assuming single occupancy and 324 households assuming double occupancy. The resulting vacant rental housing unit availability for Facility non-local workers is presented in Exhibit 19, ranging from 2.17 units per worker (single occupancy) to 4.35 units per worker (double occupancy).



Exhibit 19. Vacant Rental Housing Availability, Annual units

	Single Occupancy	Double Occupancy
Total Housing Supply	1,409	1,409
Project Housing Demand	648	324
Vacant Housing Unit Availability per Worker	2.17	4.35

Source: ECONorthwest analysis

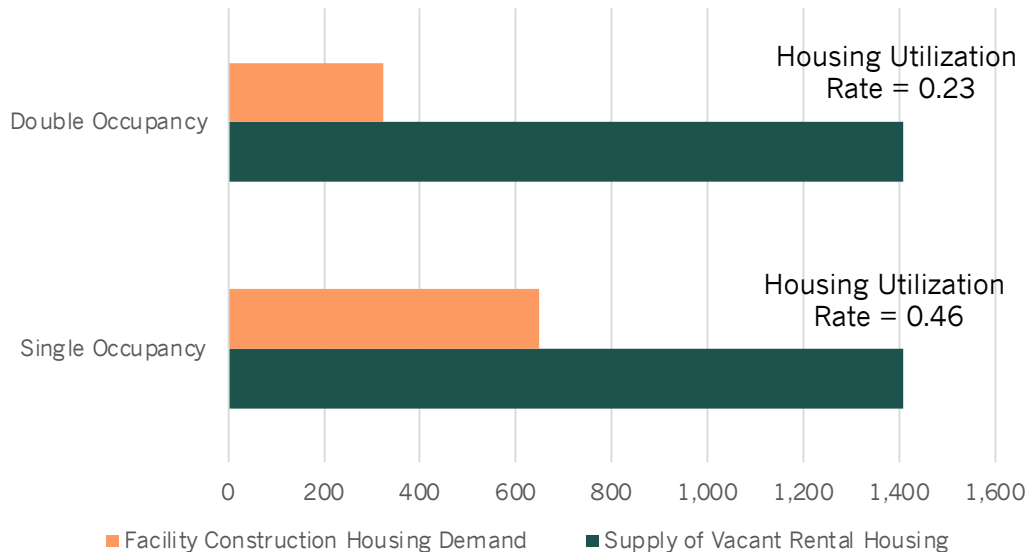
Rental Housing Vacancy Pressure

In rental markets where the supply of vacant rental units is limited, a temporary influx of non-local construction workers may increase housing demand and contribute to tighter rental conditions during peak construction periods. This analysis compares the projected increase in renter households due to Facility construction to the existing inventory of vacant rental units, expressed as the housing utilization rate, to indicate rental market tightness and identify locations where housing conditions may experience strain, including potential localized price pressures or displacement risk. A housing utilization rate below 1.0 indicates a surplus of vacant rental units relative to projected demand, suggesting the market is likely able to absorb the influx with limited pressure. A housing utilization rate above 1.0 indicates a shortage of vacant rental units relative to projected demand, signaling the potential for increased housing market pressure, including upward price effects or displacement.

The housing utilization rate associated with Facility construction is anticipated to range from 0.23 under a double-occupancy assumption to 0.46 under a single-occupancy assumption, indicating a surplus of available rental housing under both scenarios (see Exhibit 20). This indicates that available rental supply is expected to be sufficient to accommodate projected construction-related demand with limited housing market pressure, with lower housing utilization rates corresponding to lower levels of market pressure



Exhibit 20. Rental Housing Vacancy and Utilization



Source: EConorthwest Analysis

Workers seeking short term or transient housing accommodations will primarily find housing in Wasco County, and in hotels and motels, which are generally more available than RV sites. Workers planning to stay in RVs may find it difficult to secure sites in the local area throughout the year, especially during the summer months when demand is at its peak.

Workers preferring rental housing over transient lodging—perhaps because they plan to work on the Facility for over a year and could sign a year-long lease—could potentially find rental housing. However, there are fewer vacant rental housing units in the local area than there are total workers seeking housing under both the single and double occupancy scenarios.

If peak demand for Facility construction coincides with elevated regional demand from other economic development activity or population growth potentially occurring through 2030, competition for limited vacant rental housing, particularly affordable units, may intensify, potentially resulting in tighter market conditions than indicated by the housing availability analysis. At the same time, nearby counties have demonstrated experience accommodating large-scale infrastructure construction projects, including data centers and renewable energy facilities, which typically require substantial construction workforces.

EFSC applications for comparable renewable energy construction projects indicate increased demand for temporary rental housing associated with large, short-term construction workforces. Initial construction of the Montague Wind Facility, a 201-MW project in Gilliam County, was projected to require a peak workforce of approximately 475 workers (Iberdrola Renewables, 2010). The Wheatridge Wind Energy Facility, a 500-MW project in Morrow and Umatilla counties, anticipated a peak workforce of approximately 475 workers during each of two 18-month construction phases (Tetra Tech, 2015). The Golden Hills Wind Project, a 200-



MW facility in Sherman County, was projected to require a peak workforce of approximately 175 workers over a nine-month construction period (Avengrid, 2007). Taken together, these projects demonstrate that Sherman County and the surrounding region have an established track record of accommodating large temporary construction workforces and associated short-term housing demand.



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Attachment L-2. Traffic Impact Study

Traffic Impact Study

**Speedway Energy Facility
Sherman County, Oregon**

Prepared for



Speedway Energy

BGTF Speedway Project LLC

Prepared by



TETRA TECH

July 2026

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Acronyms and Abbreviations

AADT	Annual Average Daily Traffic
Applicant	BGTF Speedway Project LLC
BPA	Bonneville Power Administration
Facility	Speedway Energy Facility
I-84	Interstate Highway 84
ODOT	Oregon Department of Transportation
OR-216	Sherars Bridge Highway/State Route 216
POI	point of interconnection
SCZO	Sherman County Zoning, Subdivision, Partitioning, and Land Development Ordinance of 1994
TIS	Traffic Impact Study
US-197	U.S. Route 197
US-97	U.S. Route 97
V/C	Volume to Capacity

1.0 Introduction

BGTF Speedway Project LLC (Applicant)¹ proposes to construct and operate the Speedway Energy Facility (Facility), a renewable energy facility incorporating wind, solar, and battery energy storage, located approximately 23 miles south of Interstate 84 (I-84) at Biggs Junction in unincorporated Sherman County, Oregon.

1.1 Purpose and Scope

This Traffic Impact Study (TIS) was prepared to meet the requirements of Sherman County as described in the Sherman County Zoning, Subdivision, Partitioning, and Land Development Ordinance of 1994 (SCZO) Section 4.13 (Sherman County 2003). 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, Tetra Tech has prepared this TIS on behalf of the Applicant. As per the SCZO, the scope of the TIS was determined in coordination with the Sherman County Roadmaster Mark Coles in a conference call held on May 19, 2026 (Wikner 2026a).

The following scope was agreed to for the TIS:

- Provide details on haul routes for construction workers and truck traffic as well as roads used during construction between Facility parcels.
- Summarize existing conditions of all roadways used by the Facility.
- Provide planned routes to the Facility for oversize loads during construction.
- Describe the location and type of proposed roadway improvements needed for oversized vehicles traveling to the Facility.
- Detail possible pinch points for traffic volumes and for oversized or overweight vehicles.
- Quantify the traffic that will be generated by the construction of the Facility.

1.2 Project Description

The Facility's site boundary encompasses approximately 24,000 acres of privately owned land 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. The northernmost portion of the site boundary is 3.3 miles southeast of the city of Moro, and a small segment of the middle portion abuts the city of Grass Valley. The Facility's proposed point of interconnection (POI) to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary.

¹ References to BGTF generally include or also refer to the parent company and predecessor in interest to the project, Brookfield Renewable N.A., except where specifically noted.

1.3 Proposed Haul Routes

The primary transportation route for construction vehicles, workforce traffic, and material and equipment deliveries will be via I-84 to exit southbound on to US-97 at Biggs Junction, then continue south approximately 28.7 miles to the Facility area (Figure 1). From there, the Facility parcels would be accessed from multiple local roads as described below.

The northeast portion of the Facility—which includes 11 turbines, additional solar arrays, and two laydown yards—would be accessed via proposed driveways connecting to Rutledge Road, Lone Rock Road, and the segment of Smith Todd Road directly to the west of Lone Rock Road.

The south central and southwest portion of the Facility—which includes 33 wind turbines, additional solar arrays, and two laydown yards—would be accessed via proposed driveways connecting to Earls Lane, Sherars Bridge Highway/State Route 216 (OR-216), Davis Lane, Michigan Lane, Finnegan Road, Twin Lakes Road, Ball Lane, and US-97.

Some traffic may opt to use secondary transportation routes if coming from the south. The possible routes from the south would include U.S. Route 197 (US-197), OR-216, and US-97 as possible ways to reach the Facility. This would most likely be limited to commuting workers that live in communities along those routes.

Once construction is complete and the Facility transitions to operations, the same roads are likely to be used as previously described to reach the access driveways for regular maintenance and inspections.

2.0 Existing Conditions

The local roads included in the haul route are detailed herein (Figure 2). Details such as their functional classification, annual average daily traffic (AADT), lanes, and condition are described below. Additional roads near the Facility parcels but not anticipated to be used by construction traffic include Rosebush Lane, Stark Road, Bourbon Lane, and Barnum Lane. As such, detailed descriptions of these roadways have not been included in this study.

For U.S. and Oregon highways, the Oregon Department of Transportation (ODOT) tracks their pavement conditions in a report most recently published in 2024. When possible, that source has been reviewed and included for pavement condition information.

2.1 State and County Roads Conditions

I-84

I-84 is a four-lane divided interstate highway managed by ODOT. It is classified as an interstate highway, designed for a high capacity of high-speed traffic (ODOT 2026). The pavement for the section of highway in the vicinity of Biggs Junction appears to be in good condition as of Google Streetview Imagery captured September 2025 (Google Maps 2025). In addition, between mileposts

100 and 110, the ODOT 2024 Pavement Condition Maps (ODOT 2024a) rated I-84 to be in good condition.

US-97

US-97 is a two-lane marked asphalt highway managed by ODOT with paved and gravel shoulders. It is classified by ODOT as a principal arterial (ODOT 2026). The roadway occasionally has a temporary passing lane for one direction of travel at a time. The pavement condition was rated in the ODOT 2024 Pavement Condition Maps as generally fair or good, with one segment between milepost 18.94 and milepost 27.40 receiving a poor rating (ODOT 2024a).

Sherars Bridge Highway/ OR-216

OR-216 is a two-lane marked asphalt road with gravel shoulders managed by ODOT. It is classified by ODOT as a major collector (ODOT 2026). The pavement condition was rated in the ODOT 2024 Pavement Condition Maps as good for the entire section which would be used by Facility construction traffic (ODOT 2024a).

Lone Rock Road

Lone Rock Road is a two-lane marked asphalt road with gravel shoulders managed by Sherman County. It is classified as a major collector (ODOT 2026). In the vicinity of the Facility, the pavement looks nearly new in Google Streetview imagery dated August 2024 (Google Maps 2024).

North Street/Blagg Lane

This road is named North Street to the east of US-97 in Grass Valley and transitions to Blagg Lane after approximately 0.2 miles. The route is a two-lane marked asphalt road with gravel shoulders managed by Sherman County. On the North Street section there is a culvert with a posted load rating sign for 6–7 axles and “32T.” In Google Streetview imagery dated August 2023, the pavement on Blagg Lane appears to be in good condition, with fair condition on the North Street segment (Google Maps 2023).

Smith Todd Road

Smith Todd Road is an east-west gravel road approximately 30 feet wide that connects to Blagg Lane. The road does not have a defined functional classification in the ODOT TransGIS Data, and is likely a county road. There is no recent street level imagery available.

Rutledge Lane

Rutledge Lane is a two-lane marked asphalt road with gravel shoulders managed by Sherman County. It is classified as a major collector (ODOT 2026). In the vicinity of the Facility, the pavement looks to be in good condition in Google Streetview imagery dated September 2024 (Google Maps 2024). A bridge on this road located 3.3 miles east of US-97 was recently replaced.

Stradley Road

Stradley Road is located west of US-97, opposite Rutledge Lane. It is a gravel road approximately 23 feet wide. The road does not have a defined functional classification in the ODOT TransGIS Data and is a county road. There is no recent street level imagery available.

Earls Lane

Earls Lane is located west of US-97, opposite Barnett Road. As stated by Sherman County Roadmaster Mark Coles, Earls Lane is a dirt road with a thin gravel overlay (Wikner 2026b) approximately 24 feet wide. The road does not have a defined functional classification in the ODOT TransGIS Data and is likely a county road. There is no recent street level imagery available.

Finnegan Road

Finnegan Road is a north-south gravel road approximately 24 feet wide. The road does not have a defined functional classification and is a county road. There is no street level imagery available.

Michigan Lane

Michigan Lane is located west of US-97, opposite Rosebush Lane. As stated by Sherman County Roadmaster Mark Coles, Earls Lane is a dirt road with a thin gravel overlay (Wikner 2026b) approximately 23 feet wide. The road does not have a defined functional classification in the ODOT TransGIS Data and is a county road. There is no street level imagery available.

Twin Lakes Road

Twin Lakes Road is a north-south gravel road approximately 30 feet wide. The road does not have a defined functional classification and is a county road. There is no street level imagery available.

Ball Lane

In the vicinity of the Facility, Ball Lane is an east-west two-lane marked asphalt road with gravel shoulders. It connects to the southern end of Finnegan Road as well as Twin Lakes Road. The road is defined as a minor collector in the ODOT TransGIS Data on functional class (ODOT 2026). In Google Streetview Imagery dated September 2024, the road appears to be in good condition with very minor occasional cracking present (Google Maps 2024).

2.2 Average Annual Daily Traffic

AADT data is available via ODOT for state highways, but for most county roads no AADT counts exist. State highway volumes were published in the 2024 Traffic Volume Tables (ODOT 2024b). At the time of this assessment, the 2025 data have not been published. In 2024, I-84 near Biggs Junction had an AADT of 13,019 (ODOT 2024b). US-97 had an AADT of 9,841 just south of Biggs Junction and an AADT of 3,234 in Grass Valley. AADT available was also available for OR-216 in the vicinity of the Facility, which as of 2024 had an AADT of 73 at the intersection with Finnegan Road.

No AADT data was available for other roads discussed in this TIA. For County-managed paved roads included in this TIA, it would be reasonable to assume they have AADT values similar to that of OR-

216. For the gravel roads discussed in this TIA, they likely have AADT values similar to the AADT of similarly sized county roads, the closest comparison of which would be the AADT data available for Horseshoe Bend Road, south of the Facility, which in 2024 had an AADT of 19.

3.0 Construction Trip Generation

Construction is estimated to start as early as July 2027 and complete by December 2029, lasting a total of up to 30 months. However, for the purpose of this analysis, a shorter construction duration of 27 months was used. A shorter duration for the same construction activities results in more activity per day; therefore, this is considered conservative for this analysis. Because workers will have to travel a long distance to and from the Facility, a vehicle occupancy of 1.25 was used for commuting trips. The volumes of commuting worker traffic as well as delivery trips are provided as follows.

3.1 Construction Workers and Truck Traffic

The total number of workers during construction will vary between different activity phases, with an expected average of 600 round trips generated per day. The peak of commuting worker trips is anticipated to occur in Summer 2029 and would result in a maximum of 1,049 round trips per day. Truck traffic will also be generated as a result of materials and equipment delivery during the Facility's construction. The Applicant assumes there will be an average of 197 trucks visiting the site per day, which would result in around 394 one-way trips. The peak of truck trips would occur in Spring 2028, with a maximum of 384 trucks making deliveries daily. The combined peak daily trips would reach 1,320 round-trips per day, or 2,640 one-way trips in Summer 2028. A secondary peak in traffic would occur in Spring 2029 when the commuting worker trips peak, resulting in 1,280 round trips per day, or 2,560 one-way trips.

A variety of truck types will be required for material and equipment deliveries. These include heavy-duty trucks, such as semi-trailer dump trucks and 40-foot container trucks, that will be carrying gravel and other materials required to improve or construct new access roadways. These heavy-duty trucks will also provide aggregate and water for the on-site concrete plant. There would also be truck traffic generated internal to the site and on the roads used to travel between parcels as concrete is batched and transported to each turbine foundation location. Semi-trailer flat beds carrying electrical equipment and materials required for battery energy storage system construction will also be necessary. For the transport of turbine components and blades, oversized vehicles as described in Section 3.3 will be required. A detailed summary of anticipated truck and worker trips is provided in Appendix A: Construction Trip Generation.

3.2 Operations Traffic

Once construction is complete, the Facility will only have operations staff and occasional maintenance vehicles traveling to and from the site. There will be up to 20 full-time employees commuting to the site on workdays from local communities. This would generate 40 trips per day,

and these trips would be spread out throughout the primary haul route and secondary haul routes discussed in Section 1.3. The addition of 40 trips per day represents a negligible impact on local traffic and roads.

3.3 Oversize Loads

Oversized vehicles will use limited routes (Figure 3) and are required to transport turbine blades, tower sections, hubs, drivetrains, and nacelles. These vehicles include a 7-axle dolly and a 13-axle double Schnabel (Figure 4). In total, 880 one-way trips would be made to and from the Facility by these vehicles.

4.0 Roadway Modifications

To accommodate the oversize load vehicles that will be used to transport wind turbine components and other large equipment to the site, some modifications to turning radii and slope will be necessary. A limited number of roads will be used for oversized vehicles, and necessary routes have been determined based on the proposed placement of access roads to Facility parcels (Figure 3). The proposed roadway improvements are described as follows.

4.1 Proposed Roadway Modifications

The proposed roadway modifications include two main types of changes. The first and most commonly needed modification would include increasing the turning radius of one or more legs of an intersection to allow an oversized vehicle to safely make a turn. These have been planned to minimally impact non-participating parcels and make use of Facility parcel land. The second type of modification would be constructing an alternative alignment for a roadway alongside the existing road to avoid grades that are too steep for the oversized vehicles to safely traverse. Appendix B: Roadway Modifications Summary provides maps and descriptions of the planned modification types and locations.

4.2 Proposed Parcel Access Roads

In order to access the Facility parcels, 63 driveways/access points are proposed to be constructed along 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 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. All necessary permitting requirements with ODOT and/or Sherman County would be met before initiating construction of any driveways or other improvements.

5.0 Traffic Impacts and Mitigation

5.1 Construction Traffic Impacts

Workers commuting to the Facility are most likely to have the greatest impact on existing traffic during the morning and evening peak hours when they travel to and from the site. There may be delays at major intersections along the commuting worker routes such as US-97. On local roads and OR-216, which have a low existing AADT, the impact to existing road users from commuting workers should be minimal.

Truck traffic to and from the site will be spread out throughout the day, and will be heaviest in and around the Facility as concrete trucks travel from the on-site concrete batch plant to other portions of the Facility. Most roadways will see small delays in travel time, but these should be minor since the truck one-way trips generated will be throughout the course of the workday. At the peak of construction, this would be approximately 40 trucks per hour. The temporary increase in the level of traffic should not interfere with harvest time activities such as tractor movement between fields or delivery trucks taking agricultural products to market.

5.2 Operations Traffic Impacts

During operations, only 40 one-way trips will be generated per day by the full-time staff traveling to and from the Facility. This is anticipated to have a negligible impact to existing road users. Occasional maintenance activities may bring in other vehicles, but these would still be likely less than 100 trips per day and would represent a minimal impact to existing road users.

5.3 Best Management Practices

- 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.
- The Applicant will coordinate with the county Roadmaster to determine appropriate signage and warnings such as "Equipment on Road," "Truck Access," or "Road Crossings."
- The Applicant will coordinate with the county Roadmaster to determine appropriate implementation of traffic-diversion equipment (such as advance signage and pilot cars) if needed when slow or oversize loads are being hauled.
- The Applicant's contractor will employ flag persons as necessary to direct traffic when large equipment is exiting or entering public roads to minimize risk of accidents. Flag persons may facilitate two-way traffic on one lane by alternately restricting travel directions. This method will not require full lane closures, detours, or reroutes. Flag persons will also monitor through traffic on public roadways as necessary so that they are not in conflict with construction vehicles.

- The Applicant's contractor will maintain at least one travel lane so that roadways will not be closed to traffic due to construction vehicles entering or exiting public roads. If lane closures must occur, adequate signage for potential detours or delays will be posted.
- The Applicant and contractor will be responsible for damage to county roads directly caused by the Facility. The road(s) will be repaired in adherence with terms of a Road Use Agreement with the County.
- The Applicant's contractor will conduct awareness training for construction workforce drivers, including appropriate techniques for sharing roads with recreation users, especially cyclists.

6.0 Conclusion

The Speedway Energy Facility will have the largest impact on local roadways and road users during construction, which would occur between 2027 and 2030. 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 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. The best management practices described in Section 5.2 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.

7.0 References

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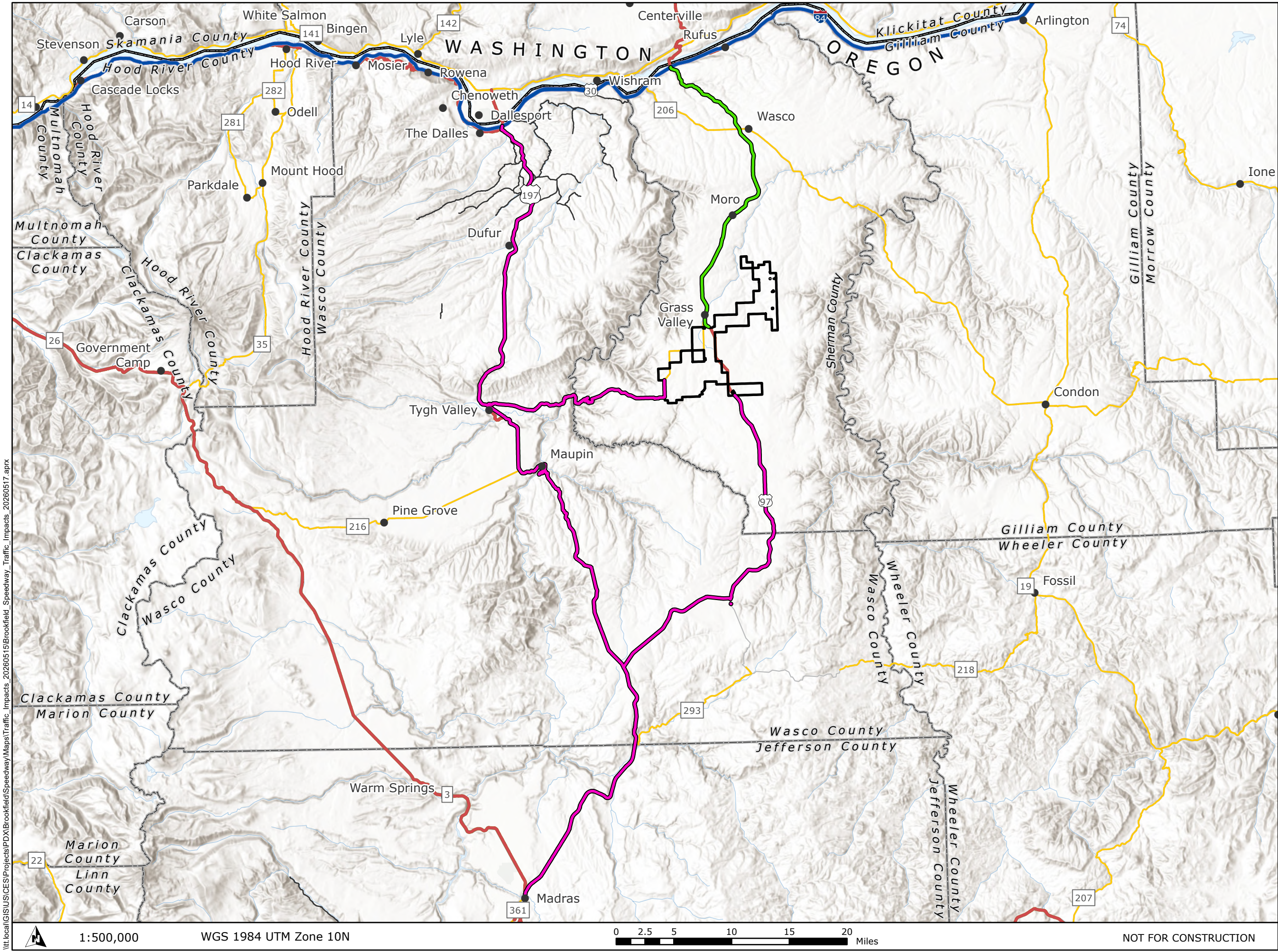
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Figures



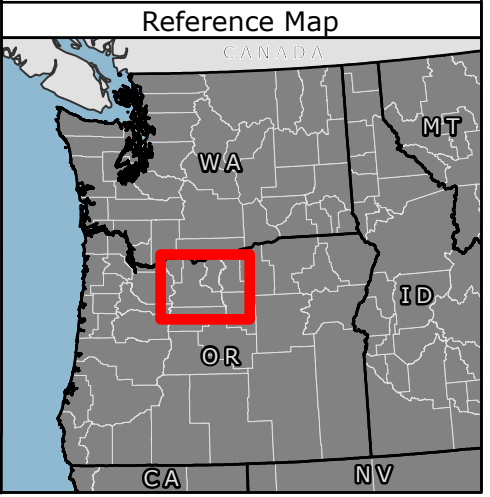
Speedway Energy Facility

Figure 1
Primary and Secondary Haul Routes

SHERMAN COUNTY, OR

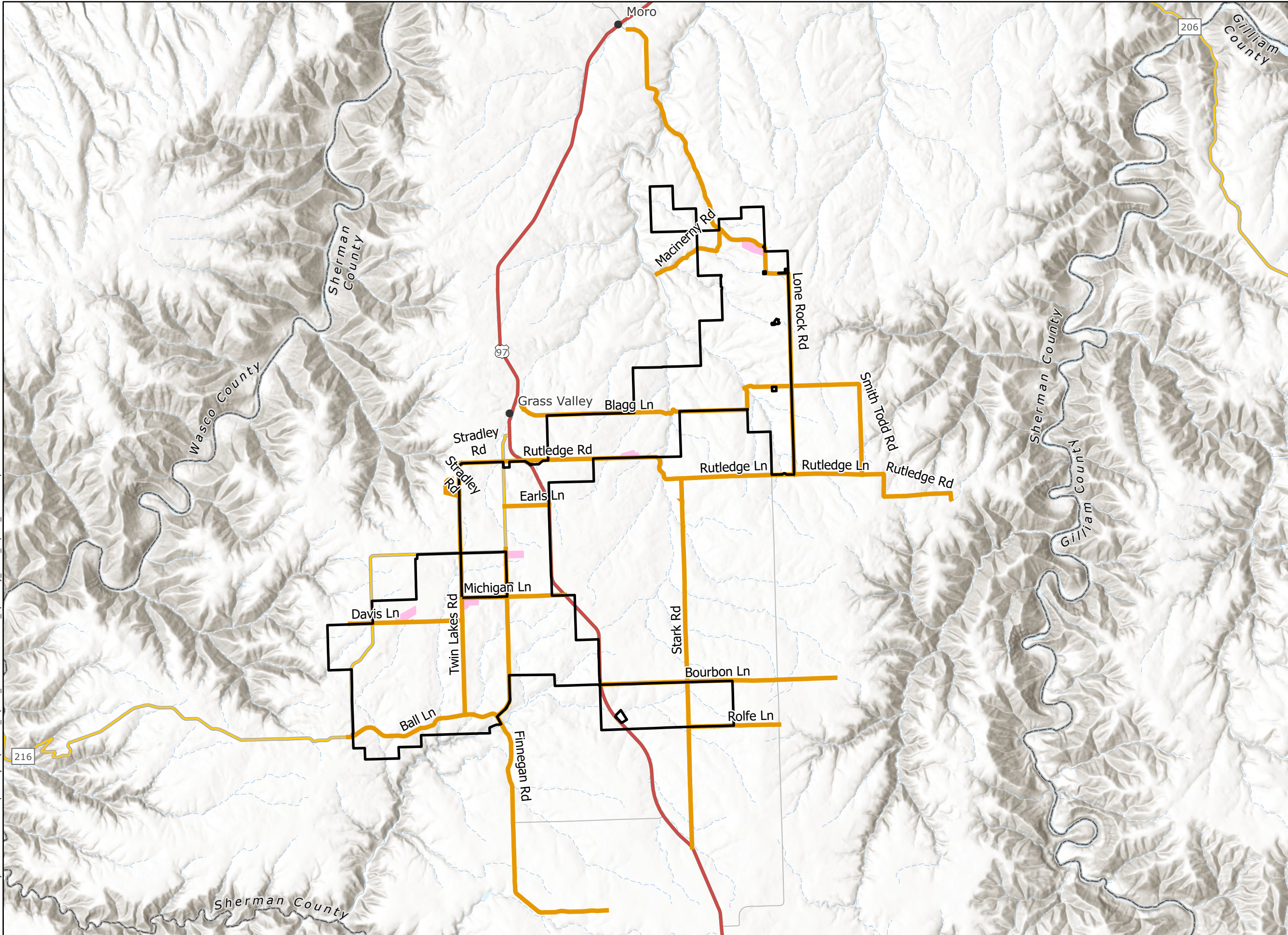
- Facility Site Boundary
- City/Town
- State Boundary
- County Boundary
- Interstate Highway
- US Highway
- State Highway
- County Highway
- Primary Haul Route
- Secondary Haul Route

TETRA TECH Speedway Energy



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Speedway Energy Facility

Figure 2
Local Roads for
Worker Traffic

SHERMAN COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads for Worker Traffic
- Laydown Yard

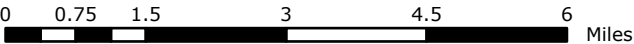


Reference Map



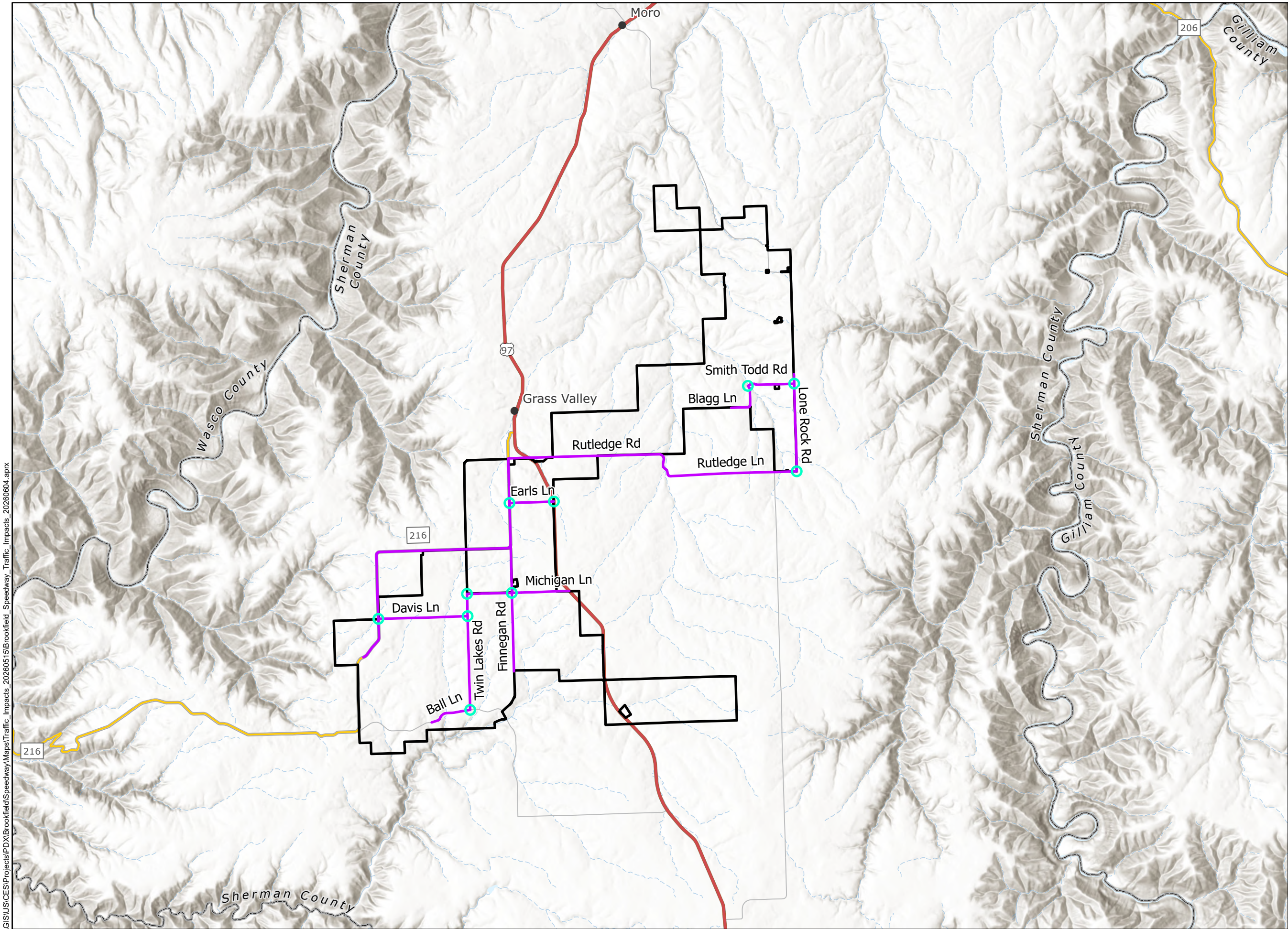
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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

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Speedway Energy Facility

Figure 3 Roads for Oversize Loads

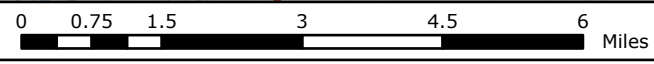
SHERMAN COUNTY, OR

- Facility Site Boundary
- City/Town
- County Boundary
- US Highway
- State Highway
- Oversize Load Routes
- Proposed Turning Radius Improvements



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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

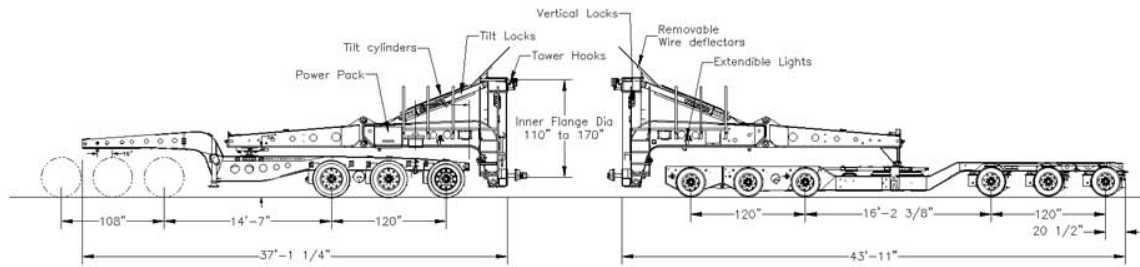


Figure 4. Double Schnabel Trailer Example

Appendix A. Construction Trip Generation

Speedway Hybrid Project - Estimated Monthly Traffic									
Year	Month	Monthly Commuter Trips	Monthly Delivery Trips	Combined Monthly Trips	% of Peak	% of Total	Daily Ingress Trips	Daily Total Trips	Month #
2027	July	5,222	922	6,144	19%	1.4%	128	256	1
2027	August	7,834	2,765	10,599	33%	2.4%	221	442	2
2027	September	10,445	3,686	14,131	45%	3.2%	294	588	3
2027	October	13,056	4,608	17,664	56%	4.0%	368	736	4
2027	November	13,056	3,686	16,742	53%	3.8%	349	698	5
2027	December	10,445	2,765	13,210	42%	3.0%	275	550	6
2028	January	10,445	3,686	14,131	45%	3.2%	294	588	7
2028	February	15,667	4,608	20,275	64%	4.6%	422	844	8
2028	March	15,667	4,608	20,275	64%	4.6%	422	844	9
2028	April	18,278	6,451	24,729	78%	5.6%	515	1030	10
2028	May	23,501	7,373	30,874	98%	7.0%	643	1286	11
2028	June	22,368	9,216	31,584	100%	7.2%	658	1316	12
2028	July	22,195	7,373	29,568	93%	6.7%	616	1232	13
2028	August	22,195	7,373	29,568	93%	6.7%	616	1232	14
2028	September	22,195	7,373	29,568	93%	6.7%	616	1232	15
2028	October	19,584	6,253	25,837	82%	5.9%	538	1076	16
2028	November	14,362	4,608	18,970	60%	4.3%	395	790	17
2028	December	15,667	3,686	19,353	61%	4.4%	403	806	18
2029	January	13,056	4,608	17,664	56%	4.0%	368	736	19
2029	February	16,973	5,530	22,503	71%	5.1%	469	938	20
2029	March	23,501	5,530	29,031	92%	6.6%	605	1210	21
2029	April	26,112	5,530	31,642	100%	7.2%	659	1318	22
2029	May	23,501	5,530	29,031	92%	6.6%	605	1210	23
2029	June	20,890	3,686	24,576	78%	5.6%	512	1024	24
2029	July	15,667	3,686	19,353	61%	4.4%	403	806	25
2029	August	13,056	1,843	14,899	47%	3.4%	310	620	26
2029	September	5,222	461	5,683	18%	1.3%	118	236	27
Total Trips		440,160	127,444	567,604					

Notes:

Assumes 24 working days per month

Assumes 1.25 vehicle occupancy for commuter trips.

Speedway Hybrid Project

Summary of Traffic Projections (Truck Counts)

Prepared by: Westwood | Date: March 26, 2026 | Revision: 0

Purpose

To summarize the construction-related traffic projections prepared for the Speedway Hybrid Project. These estimates are intended to support high-level planning regarding anticipated project traffic on local public roads.

Summary of Analysis

Westwood developed traffic projections for all major construction activities associated with the wind, solar, storage (BESS), and high-voltage (HV) components of the project. Estimates were based on the 10% design layouts, manufacturer specifications when available, and standard industry assumptions where project-specific data was unavailable. Key project parameters driving the analysis include **44 wind turbines, 1,871 MW DC / 1,401 MW AC of solar capacity, 2,312 MW-hr of BESS**, and a **27-month construction schedule**.

All project materials are assumed to arrive via US Highway 97. These projections represent a high-level planning-level estimate based on numerous assumptions, industry experience, and engineering judgment.

Traffic was categorized across the following activity types: turbine component deliveries (blades, tower sections, nacelle, hub, drivetrain), crane transport, solar PV material deliveries (panels, racking, piles, cabling), BESS container deliveries, aggregate and concrete for roads and foundations, water hauling for dust control and construction, substation transformer (MPT) deliveries, HV transmission line materials, and general construction equipment and commuter traffic.

Total Estimated Project Traffic

The analysis yielded a total of **567,604 vehicle trips** (ingress and egress combined) over the construction period, summarized as follows:

Category	Total Trips	% of Total Trips
Turbine Component Deliveries	1,760	0.31%
Wind Crawler Crane Transport	100	0.02%
Solar PV Material Deliveries	22,416	3.95%
BESS Vehicles	1,290	0.23%
Aggregate, Concrete & Cement	72,570	12.78%
Water Trucks	19,960	3.52%
MPT & HV Deliveries	2,168	0.38%
Heavy Equipment & Field Office	780	0.14%
Other Material Trucks	6,400	1.13%
Commuter Passenger Vehicles	440,160	77.54%
Total	567,604	100.00%

Commuter traffic accounts for the significant majority of total trips (~77%), reflecting the large workforce associated with a project of this scale. Excluding commuter vehicles, **construction-related truck and equipment trips total approximately 127,444**.

Attachments:

Attachment 1 – Speedway Truck Counts Basis of Design and Data Sources

Attachment 2 - Speedway Truck Counts by Vehicle Table

Speedway Wind and Solar Hybrid Project		
Project Truck Counts Basis of Design		
Revision Number	Date	Description
0	3/27/2026	Initial Issue
Delivery Commodities Modeled	Notes	Source
Turbine Component Delivery Trucks	3 Blades, 4 Tower Sections, Nacelle, Drivetrain, Hub	Vestas V163 4.5MW civil specifications document. 98 m hub height for 4 tower sections
Solar PV Material Delivery Trucks	PV Panels, Array Racking, Wire and Cable, Collection System	
Aggregate Delivery Trucks	Material for access roads, facility pads, temporary widenings, concrete at batch plant.	
Concrete Delivery Trucks	Material for turbine foundations, solar equipment foundations.	
Cement Delivery Trucks	Deliveries to batch plant	
Water Delivery Trucks	Site water usage and delivery to batch plant	
Other Delivery Trucks	Misc deliveries to turbine and facility locations	
Crawler Crane Delivery Trucks	Transport of crane components	
RT Crane Travel	Two-axle RT Crane	Grove RT890E
Commuter Traffic	Commuter light duty pick-up trucks for construction trades, project management staff, survey, equipment operators.	
Project and Construction Assumptions	Value	Notes
Number of New Turbines	44 EA	Per array provided by client.
Wind Farm Only Access Road Width	16 FT	Assumed standard access road width.
Wind Farm Only Access Road Gravel Depth	8 IN	Assumed value - applied to wind only and shared wind/solar roads. Includes shared wind/solar roads.
Wind Farm Only Access Road Length	55,000 LF	Per 10% Design
Wind Farm and Solar Shared Access Road Width	24 FT	Assumed standard access road width.
Wind Farm and Solar Shared Access Road Gravel Depth	10 IN	Assumed value - applied to wind only and shared wind/solar roads. Includes shared wind/solar roads.
Wind Farm and Solar Shared Access Road Length	47,000 LF	Per 10% Design
Intersection Improvements	50 EA	Assumed size based on industry standard intersections.
Turbine Foundation Size	700 CY	Quantities include 10% additional concrete for mud mat. Assumed based on turbine model.
Crawler Crane Delivery	40 trucks per breakdown/assembly	Assumed one breakdown/assembly loading for each segment.
RT Crane Trips	10 per segment	10 trips per segment, with 20 near the laydown yards.
Facility Pads	BESS Facility (10 ac), Laydown Yards (32, 46, 28, 52 ac), Welcome Yards (10, 8 ac)O&M (5 ac (assumed)), Substations (20 ac, 2.5 ac (x6))	Assumed 6 inch section for laydown, 8 inch BESS and O&M. Assume 12 inch section for substations.
Water Delivered to Batch Plant	Yes	Water used for concrete production at batch plant.
Assumed Site Water Use (Wind Farm)	3.9 million GAL	Water used for dust control, aggregate compaction, revegetation.
Solar Capacity	1871 MW DC, 1401 MW AC	Per 10% Design
Module Wattage	705 W	Per 10% Design
Module Quantity	2,654,522	Per 10% Design
Solar Access Road Width	16 FT	Assumed value
Solar Access Road Gravel Depth	6 IN	Assumed value
Solar Access Road Length	428,690 LF	Per 10% Design
Solar Array Fence Area	9,377 ac	Per 10% Design
Assumed Site Water Use (Solar)	35 million GAL	Water used for dust control, aggregate compaction, revegetation.
BESS Size	2,312 MW-Hr	Per 10% Design
BESS Number of Containers	479	Tesla Megapack 3, Initial Overbuild (excludes future augmentation)
BESS Access Road Length	5600 LF	Per 10% Design
Transmission Line Length	14 miles	Assumed per transmission line corridor
Routing Assumptions	Value	Notes
Turbine Component Delivery Origin	Arriving via US Highway 97	
Solar PV Component Delivery Origin	Arriving via US Highway 97	
Aggregate Delivery Origin	Arriving via US Highway 97	
Concrete Delivery Origin	On-site batch plant	
Water Delivery Origin	Arriving via US Highway 97	
Other Delivery Origin	Arriving via US Highway 97	
RT Crane Passes	10 passes per segment, 2x10 near laydown yard	
MPT Delivery Origin	Arriving via US Highway 97	
Documentation/References		
Item	File	Notes
Turbine Component Information	Vestas Civil Works Document V163	Vestas V163 turbine document
PV Component Information	2026-02-23 Speedway Hybrid Project - PV Civil BOD	Basis of design document
BESS Component Information	2026-02-27 Speedway BESS - 10% BOD.pdf	Basis of design document
Wind Design Layout	2026-03-27 Speedway Wind 10% Civil Design.kmz	10% Design Layout
Solar PV Design Layout	2026-02-23 Speedway Solar 10% Design - Civil.kmz	10% Design Layout
BESS Design Layout	2026-02-27 Speedway BESS - 10% KMZ	10% Design Layout
HV Transmission Design Layout	-	Based on assumptions and transmission line easement corridor.

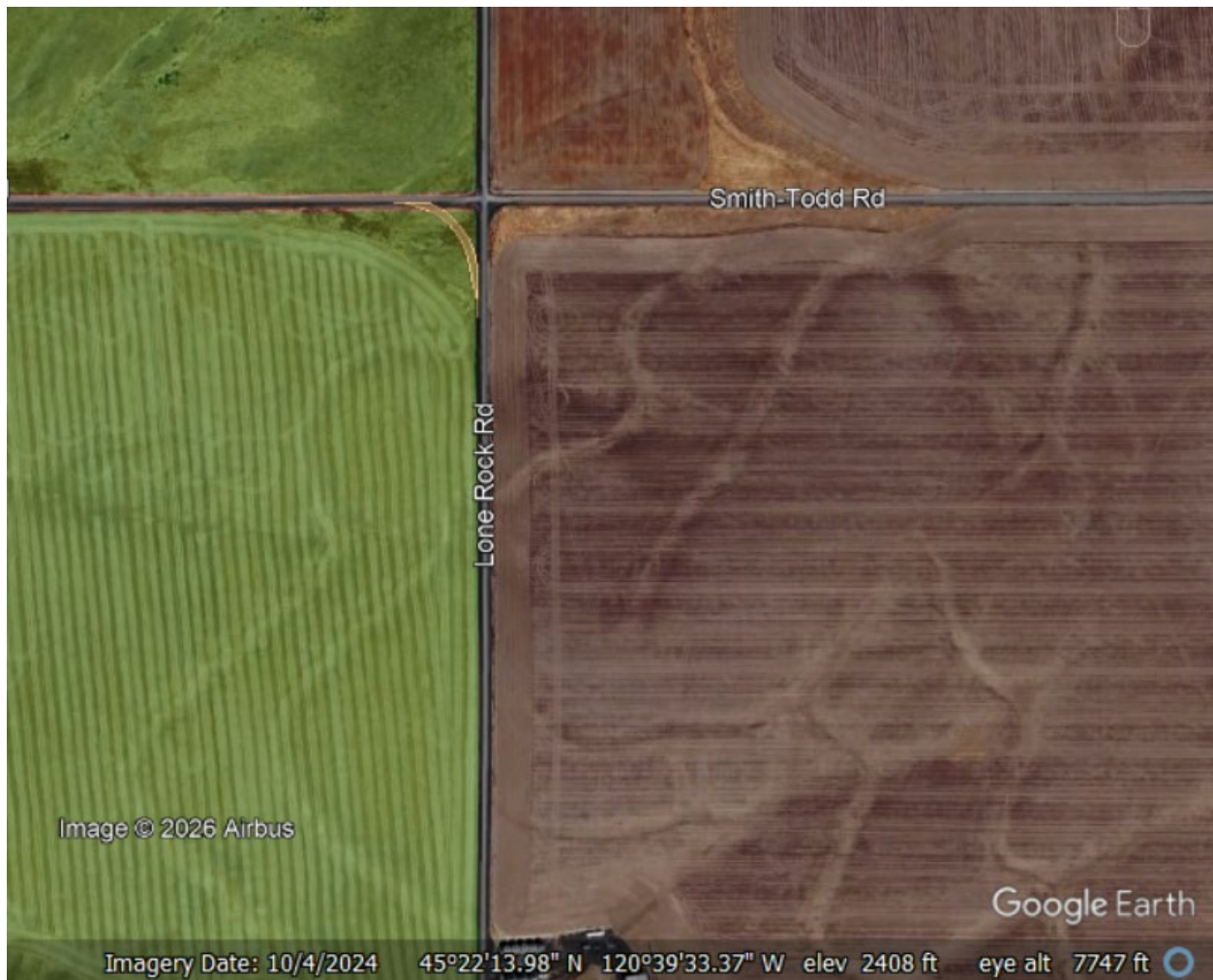
Speedway Wind and Solar Hybrid Project

Estimated Project Truck Counts by Vehicle	Vehicle Notes	Ingress Trips	Egress Trips	Total Trips	Delivery Notes
Turbine Delivery Vehicles					
Turbine Blade Delivery Vehicle	7 axle dolly, overweight load permit	132	132	264	Based on 44 turbines, 3 blades per turbine.
Tower Section Delivery Vehicle	13 axle double Schnabel, overweight load permit	176	176	352	Based on 44 turbines, 4 sections per turbine.
Hub Delivery Vehicle	13 axle double Schnabel, overweight load permit	44	44	88	Based on 44 turbines, 1 per turbine.
Drivetrain Delivery Vehicle	13 axle double Schnabel, overweight load permit	44	44	88	Based on 44 turbines, 1 per turbine.
Nacelle Delivery Vehicle	13 axle double Schnabel, overweight load permit	44	44	88	Based on 44 turbines, 1 per turbine.
Other Turbine Site Deliveries	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	440	440	880	Based on 44 turbines, 10 misc deliveries per turbine.
Crane Loads					
RT Crane	Weight can vary, assume 117,000 GVW, two axle RT crane	10	10	20	Based on 10 RT crane passes per segment
Crawler Crane Transport Trucks	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	40	40	80	Based on 40 crane component transport trucks for main erection crane.
Commuter Passenger Vehicles					
Technicians, construction trades, subcontractors, operators, managers, admin, etc	Mostly 1/2 ton pickup truck. 9,900 GVWR	220,080	220,080	440,160	Based on 320 Solar Workers, 46 BESS Workers, 130 HV and Substation Workers, 180 Wind Workers and a 27-month project schedule.
Heavy Equipment Deliveries					
Bulldozer, FE Loader, Grader, Compactor, Telehandler, Pile Driver, Trenching Equipment, etc	Standard drop-deck trailer or low-boy trailer. 80,000 lbs to 110,000 lbs GVWR	300	300	600	Based on 100 Deliveries per Laydown Yard. Bulldozer, grader, compacter, skid steers, pile driver, backhoe, truck crane, etc
Field Office Trailers, Storage Containers					
Field Office Trailers, Storage Container Delivery Trucks	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	90	90	180	Based on 30 Deliveries per Laydown Yard.
Material Vehicles					
Aggregate Truck (for Wind Farm)	Belly or End Dump Trailer, 16 CY capacity. 80,000 lbs GVWR	5,579	5,579	11,159	Based on 102,000 LF of access roads, 50 temporary gravel improvements, and aggregate for concrete for 44 turbine foundations.
Aggregate Truck (for BESS, O&M, Substations, Laydown Yards, Welcome Yards)	Belly or End Dump Trailer, 16 CY capacity. 80,000 lbs GVWR	16,132	16,132	32,264	Based on 3 laydown yard pads, 1 O&M pad, 7 substation pads, 1 BESS pad.
Aggregate Truck (for Solar Farm access roads)	Belly or End Dump Trailer, 16 CY capacity. 80,000 lbs GVWR	10,053	10,053	20,106	Based on 428690 LF of access road.
Cement Truck	Bulk Trailer, Tandem Rear, 18 CY capacity. 80,000 lbs GVWR	500	500	1,000	Based on concrete production for 44 foundations of 700 CY.
Concrete Truck (for Wind)	Tridem Rear with tag axle, 10 CY capacity, 66,000 lbs	3,388	3,388	6,776	Based on concrete production for 44 foundations of 700 CY.
Concrete Truck (for Solar)	Tridem Rear with tag axle, 10 CY capacity, 66,000 lbs	633	633	1,266	Based on 453 skid foundations.
Water Truck (for Wind)	Tandem Rear, 4000 gallon capacity. 56,000 lbs	1,230	1,230	2,460	Based on 4.96 million gallon site water use for compaction, dust control, revegetation and water for batch plant.
Water Truck (for Solar)	Tandem Rear, 4000 gallon capacity. 56,000 lbs	8,750	8,750	17,500	Based on 35 million gallons of site water use for compaction, dust control and revegetation.
Other Truck (for Wind)	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	600	600	1,200	Based on assume 200 loads per laydown yard location.
Other Truck (for Substation equipment, materials, foundations)	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	1,400	1,400	2,800	Based on assume 200 loads per substation location.
Misc Mail, Food, Sanitation and Fuel Deliveries	Standard semi-trailer or box truck. 80,000 lbs GVWR	1,200	1,200	2,400	Based on assume 400 loads per laydown location.
Solar PV Material Deliveries					
Foundation Piles	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	1,399	1,399	2,798	Based on 437332 piles.
Array Racking	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	4,053	4,053	8,106	Based on 28644 racks.
PV Panels	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	4,981	4,981	9,962	Based on 2654522 modules.
Wire and Cable - Collection System	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	145	145	290	Based on 6512000 pounds of wiring.
Solar Equipment Skids	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	453	453	906	Based on 453 equipment skids.
Fence Deliveries	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	177	177	354	Based on 720323 feet of fence.
BESS Vehicles					
BESS Container Vehicles	Overweight trailer. 86,000 lbs load, est. 140,000 lbs GVWR.	600	600	1,200	Based on 480 battery container deliveries and 120 additional equipment deliveries.
Steel for BESS Foundation Piles	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	45	45	90	Based on 480 sets of 8 foundation piles.
MPT Delivery Vehicles					
MPT Delivery Vehicles	Heavyweight low-boy trailer, overweight load permit. 525,000 lbs load, 900,000 lbs GVWR estimate	12	12	24	Based on one per collector substation and six for main collector substation.
High Voltage Transmission Deliveries					
Material Delivery for HV Structures and Line (Poles, Foundations, Conductor Wire,Earthwork)	Standard high-bed or drop-deck trailer. 80,000 lbs GVWR	1,040	1,040	2,080	Based on 15 mile transmission line route, assumed 1 pole per 1000 FT, 13 deliveries per pole.
Installation Equipment Delivery and Transport	Standard drop-deck trailer or low-boy trailer. 80,000 lbs to 110,000 lbs GVWR	32	32	64	Based on 15 mile transmission line route, assume 32 trips for equipment delivery.
Total		283,802	283,802	567,604	

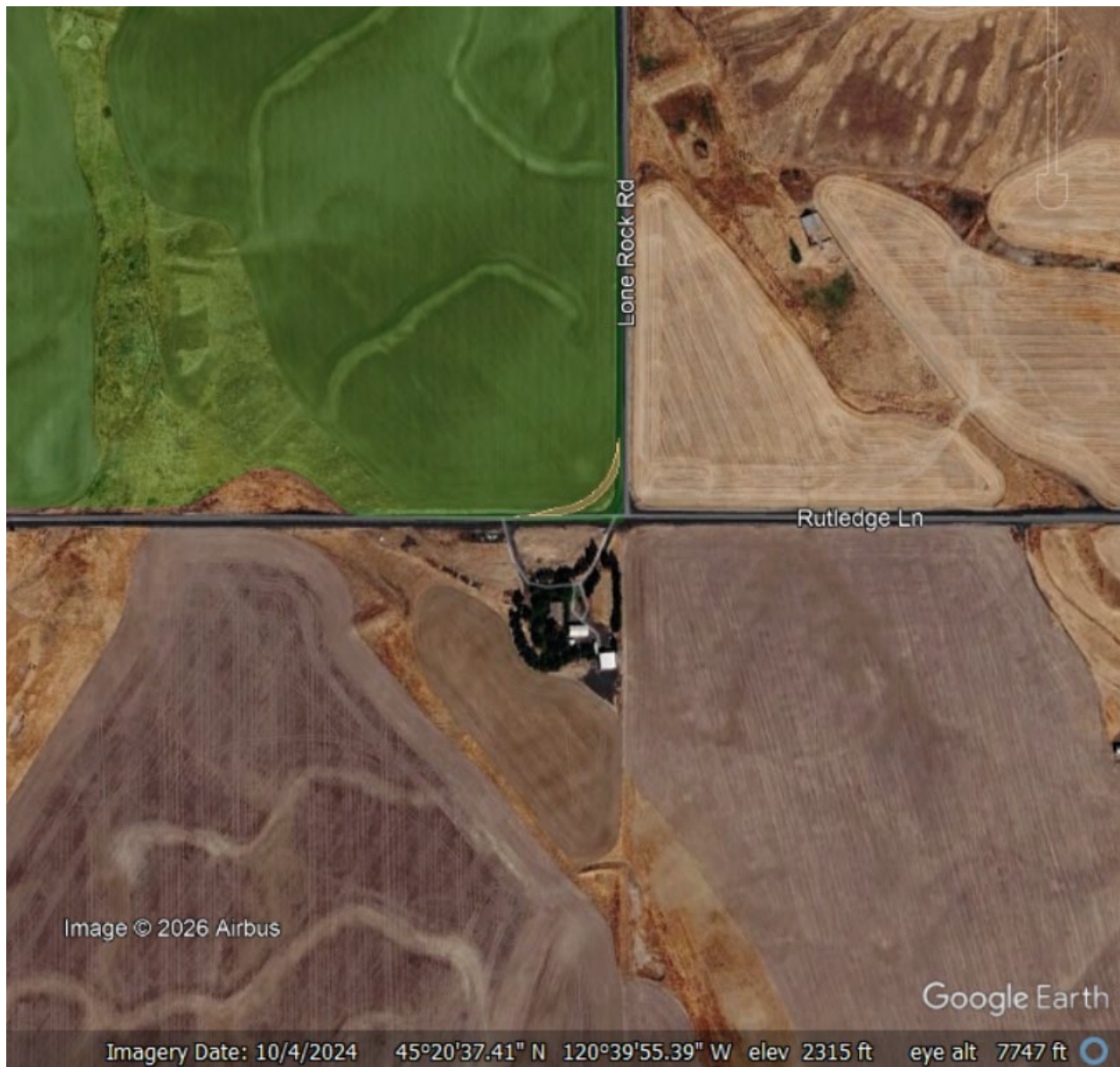
Appendix B: Roadway Modifications Summary



Radius Increase at T-intersection of Blagg Lane and continuation of Blagg Lane; Realignment of Blagg Lane



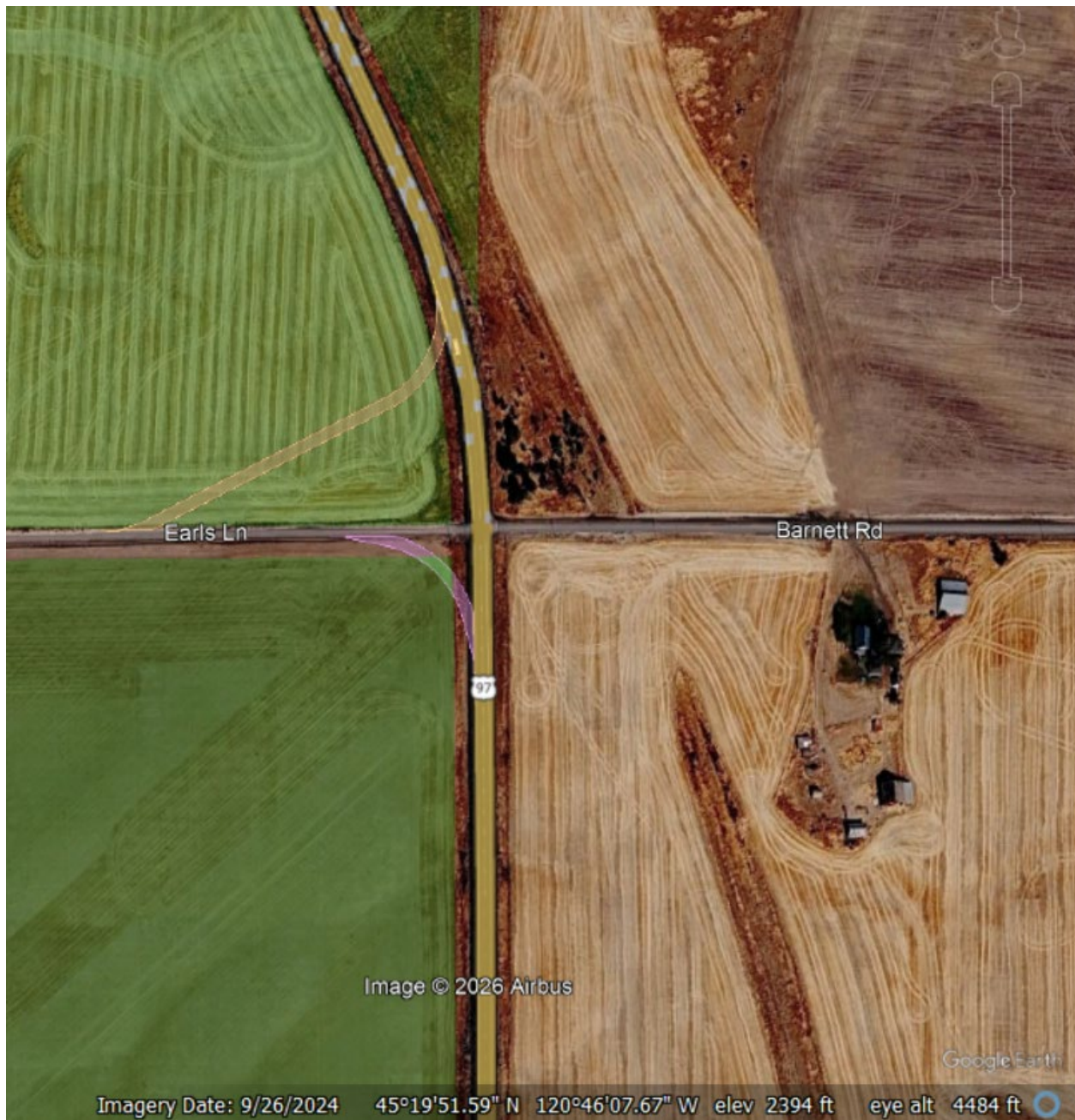
Radius Increase at Intersection of Lone Rock Road and Smith Todd Road



Radius Increase at Intersection of Lone Rock Road and Rutledge Lane



Alternate Alignment at Intersection of US-97 and Rutledge Lane



Radius Increase at Intersection of US-97 and Earls Lane



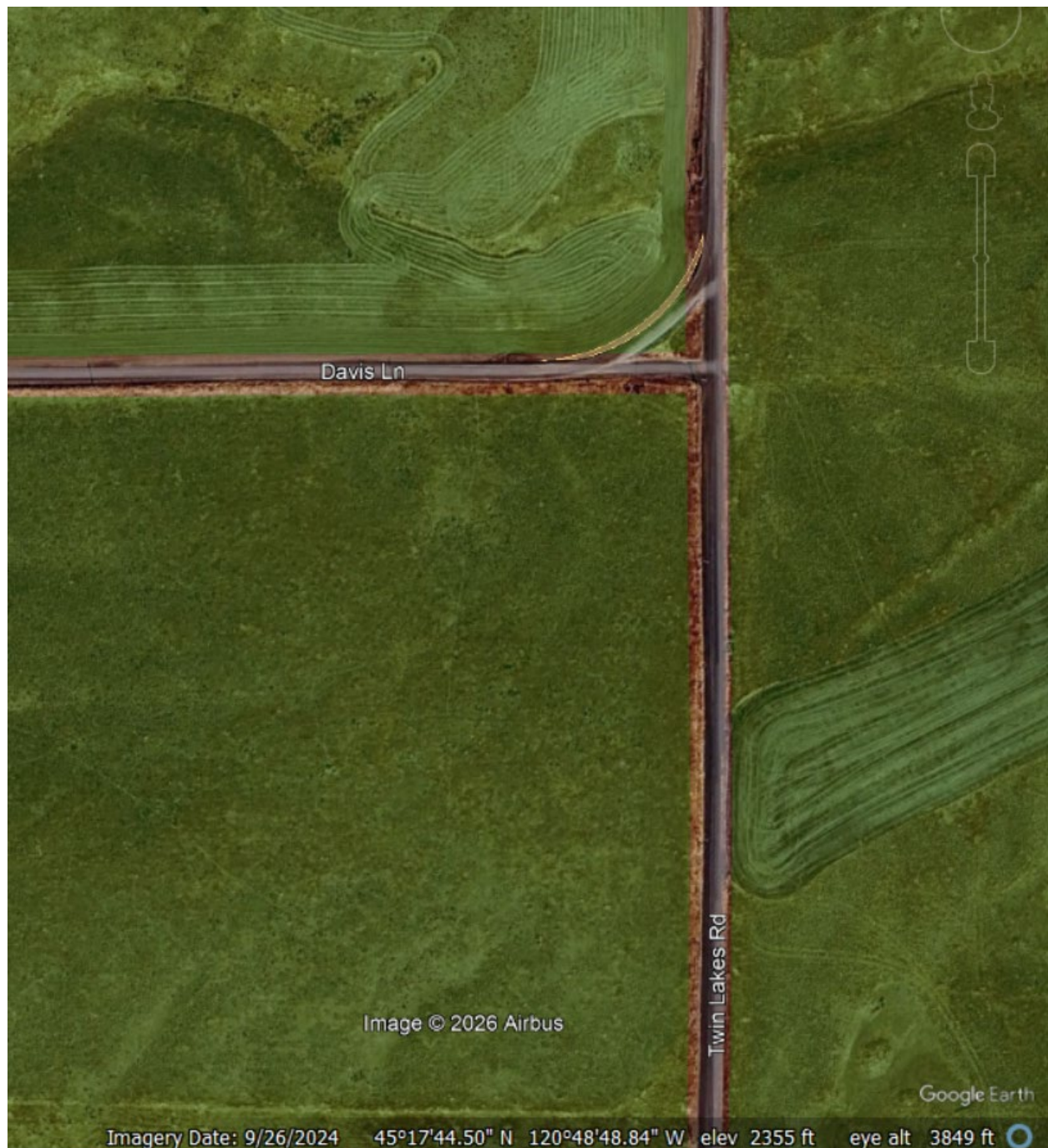
Radius Increase at Intersection of Earls Lane and OR-216; Realignment along Earls Lane



Radius Increase at Intersection of Finnegan Road and Michigan Lane; Realignment Along Michigan Lane



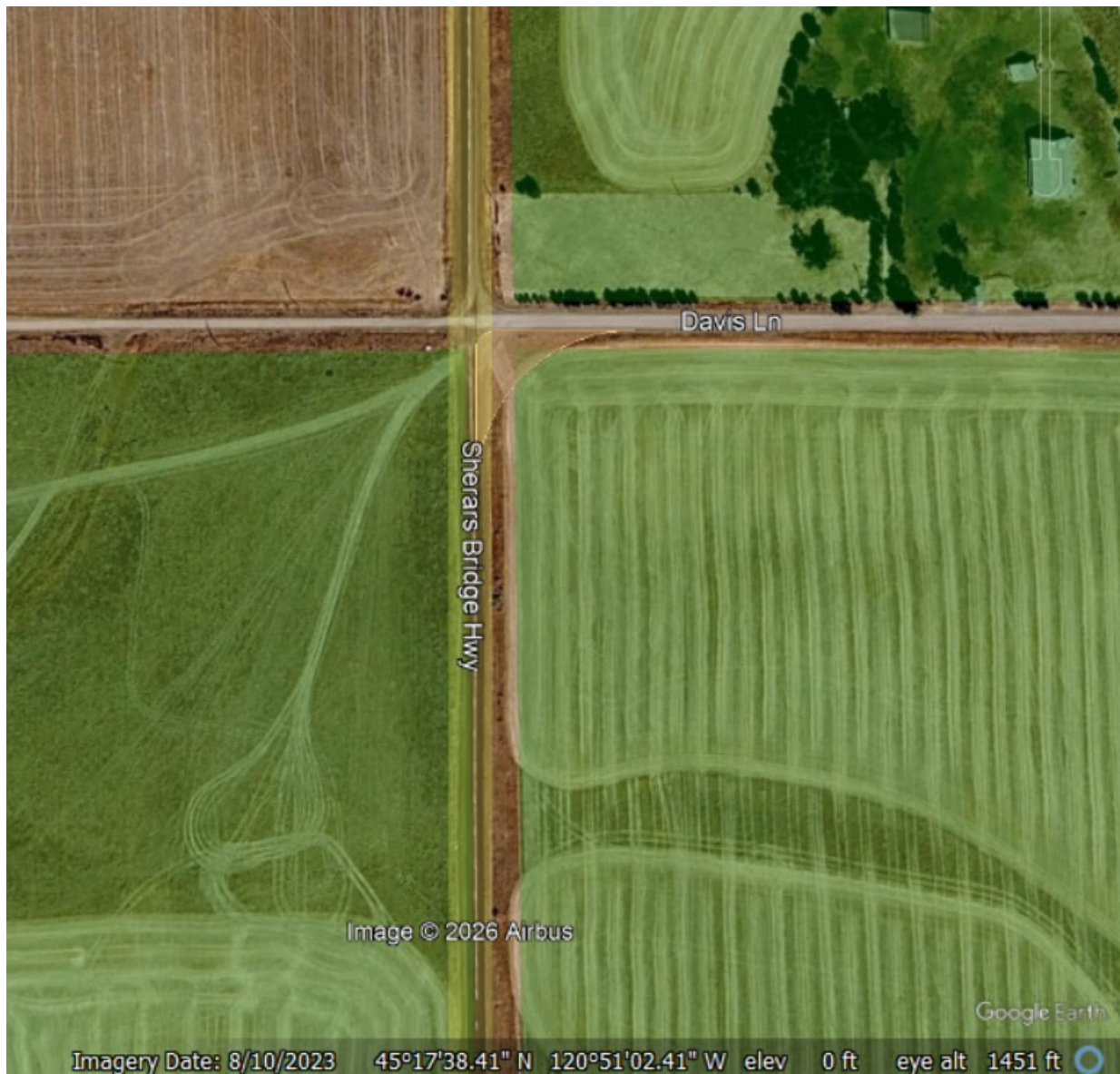
Radius Increase at Intersection of Twin Lakes Road and Michigan Lane



Radius Increase at Intersection of Twin Lakes Road and Davis Lane



Realignment of Davis Lane Between OR-216 and Twin Lakes Road



Radius Increase at Intersection of OR-216 and Davis Lane



Radius Increase at Intersection of Twin Lakes Road and Ball Lane

Attachment L-3. Service Provider Letters

From: [Krening, Mark](#)
To: [Gulick, Kristen](#)
Cc: [Swift, Megan](#); [Quinonez, Vanessa](#)
Subject: RE: Columbia Ridge Landfill - Waste Services for Speedway Energy Facility
Date: Wednesday, December 24, 2025 10:18:58 AM
Attachments: [image012.png](#)
[image013.png](#)
[image017.png](#)
[image018.png](#)
[image019.png](#)
[image020.png](#)
[image021.png](#)
[CLRFactSheet_Final.pdf](#)

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Good morning, Kristen.

Columbia Ridge Landfill has an estimated life span of over 140 years. This landfill currently has no capacity requirements and WM can accept all the non-hazardous waste that will be generated at the proposed Speedway Energy Facility for direct landfill disposal.

Let me know if you have any questions or require any additional information.

Mark Krening

Senior Industrial Account Executive
Pacific Northwest - Oregon

-
mkrening@wm.com

503.519.3959

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From: Quinonez, Vanessa <vquinon1@wm.com>
Sent: Wednesday, December 17, 2025 3:30 PM
To: Krening, Mark <MKrening@wm.com>
Cc: Swift, Megan <mswift3@wm.com>

Subject: FW: Columbia Ridge Landfill - Waste Services for Speedway Energy Facility

Hi Mark,

Please see email below regarding business opportunity from Sherman County, Oregon for Columbia Ridge LF.

Please note: The TSC will be closed on Thursday, December 25th in observance of Christmas Day and Thursday, January 1st 2026, in observance of New Years Day.

Thank you,

Vanessa Quinonez

Industrial Technical Service Representative

Western Technical Service Center

559-834-1888 (Direct)

vquinon1@wm.com

-

1-800-963-4776 (Main)

tscwestern@wm.com

-



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From: TSCWestern <tscwestern@wm.com>

Sent: Wednesday, December 17, 2025 3:25 PM

To: Quinonez, Vanessa <vquinon1@wm.com>

Subject: FW: Columbia Ridge Landfill - Waste Services for Speedway Energy Facility

Hey V,

Let me know if you're no longer the cover person for Megan

Western TSC

Western Technical Service Center

tscwestern@wm.com

(559) 834-9151



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From: Lang, Jackie <jjlang@wm.com>

Sent: Wednesday, December 17, 2025 3:28 PM

To: TSCWestern <tscwestern@wm.com>

Subject: FW: Columbia Ridge Landfill - Waste Services for Speedway Energy Facility

Business opportunity for CRL. Will you address this? Let me know if you need help from my end.

Jackie J. Lang

Senior Area Manager – Strategic Engagement and Public Affairs
Pacific Northwest/British Columbia

jjlang@wm.com

503-705-0007

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innovation.wmnorthwest.com



From: Gulick, Kristen <Kristen.Gulick@tetrattech.com>

Sent: Wednesday, December 17, 2025 2:21 PM

To: TSCPortland <TSCPortland@wm.com>; Lang, Jackie <jjlang@wm.com>

Subject: [EXTERNAL] Columbia Ridge Landfill - Waste Services for Speedway Energy Facility

Hello,

I am contacting you on behalf of the proposed Speedway Energy Facility (Speedway).

Speedway is a proposed 1,400-megawatt wind/solar power generation facility in Sherman

County, Oregon owned by BGTF Speedway Project LLC (BGTF). More information on Speedway can be found here: <https://www.oregon.gov/energy/facilities-safety/facilities/Pages/SEF.aspx>

Our current, conservative, estimate of non-hazardous waste anticipated for facility construction over an 18-month period is 50,000 cubic yards. Tetra Tech is under contract to BGTF through the Oregon Dept. of Energy's (ODOE) permitting process. To this end, we will provide to ODOE evidence of consultation with local municipalities that we have been in contact regarding waste services for the construction of Speedway. At this point in the process, BGTF is not required to have entered into a contract with the Columbia Ridge Landfill – Waste Management Inc., we just need to demonstrate to ODOE that we have been in consultation with the Columbia Ridge Landfill – Waste Management Inc. and that yes, you are able to provide waste services, as well as any constraints you may have (e.g., capacity available). Any letter from you to me on this subject does not constitute a contract and you are under no obligation to supply waste services for the facility.

If you could please provide a letter addressing Speedway as soon as possible, that would be greatly appreciated. *It can be a statement on your letterhead with your signature if you like, or even a reply to this email.* A mention of when the landfill is projected to reach capacity would be great to include, for Speedway has an anticipated lifespan of up to 50 years, which would include retirement and decommission waste disposal.

Thank you in advance and let me know if you have any questions!

Kristen Gulick, MS (she/her) | Senior Associate Environmental Scientist/Planner | Tetra Tech
Mobile (541) 740-3316 | kristen.gulick@tetratech.com



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From: [James Burgett](#)
To: [Gulick, Kristen](#)
Subject: Re: Sherman County Sheriff's Office - Law Enforcement Services for Speedway Energy Facility
Date: Thursday, December 18, 2025 3:50:44 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Received and thank you for the heads up. Usually, the only issues we have with these projects are driving complaints and theft from the construction site. We will be able to respond to calls but we always recommend on site security as we do not provide 24hr coverage.

Thank you,

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

From: Gulick, Kristen <Kristen.Gulick@tetrattech.com>
Sent: Wednesday, December 17, 2025 11:47 AM
To: James Burgett <jburgett@shermancountyor.gov>; James Burgett <jburgett@shermancountyor.gov>
Cc: Kyle Pfeifer <kpfeifer@co.sherman.or.us>
Subject: Sherman County Sheriff's Office - Law Enforcement Services for Speedway Energy Facility

Hello,

I am contacting you on behalf of the proposed Speedway Energy Facility (Speedway). Speedway is a proposed 1,400-megawatt wind/solar power generation facility in Sherman County, Oregon owned by BGTF Speedway Project LLC (BGTF). More information on Speedway can be found here: <https://www.oregon.gov/energy/facilities-safety/facilities/Pages/SEF.aspx>

Tetra Tech is under contract to BGTF through the Oregon Dept. of Energy's (ODOE) permitting process. To this end, we will provide to ODOE evidence of consultation with local municipalities that we have been in contact regarding law enforcement services for the construction of Speedway. At this point in the process, BGTF is not required to have entered into a contract with the Sherman County Sheriff, we just need to demonstrate to ODOE that we have been in consultation with the Sherman County Sheriff and that yes, you are able to

provide law enforcement services, as well as any constraints you may have. Any letter from you to me on this subject does not constitute a contract and you are under no obligation to provide law enforcement services for the facility.

If you could please provide a letter addressing Speedway as soon as possible, that would be greatly appreciated. *It can be a statement on your letterhead with your signature if you like, or even a reply to this email.*

Thank you in advance and let me know if you have any questions!

Kristen Gulick, MS (she/her) | Senior Associate Environmental Scientist/Planner | Tetra Tech
Mobile (541) 740-3316 | kristen.gulick@tetrattech.com



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From: [Joseph Belshe](#)
To: [Gulick, Kristen](#)
Subject: Re: Moro Rural Fire Protection District - Fire Protection Services for Speedway Energy Facility
Date: Wednesday, February 4, 2026 6:06:08 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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I am extremely sorry about that. Yes we are able to provide services, However depending on the scope and layout of the project will need to be seen before i can give any limitations other than confined space. We can and will provide fire suppression during construction, after construction we will have to evaluate the site before i can speak on suppression inside the fence.

On Wed, Feb 4, 2026 at 3:53 PM Gulick, Kristen <Kristen.Gulick@tetratech.com> wrote:

Hi there,

I just wanted to follow up on my initial email. Please let me know what you think!

Thanks in advance,

Kristen Gulick, MS (she/her) | Senior Associate Environmental Scientist/Planner | Tetra Tech

Mobile (541) 740-3316 | kristen.gulick@tetratech.com



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From: Gulick, Kristen

Sent: Thursday, January 29, 2026 10:08 AM

To: joseph.belshe@morofire.com

Subject: Moro Rural Fire Protection District - Fire Protection Services for Speedway Energy Facility

Hello,

I am contacting you on behalf of the proposed Speedway Energy Facility (Speedway). Speedway is a proposed 1,400-megawatt wind/solar power generation facility in Sherman County, Oregon owned by BGTF Speedway Project LLC (BGTF). More information on Speedway can be found here: <https://www.oregon.gov/energy/facilities-safety/facilities/Pages/SEF.aspx>

Tetra Tech is under contract to BGTF through the Oregon Dept. of Energy's (ODOE) permitting process. To this end, we will provide to ODOE evidence of consultation with local utilities that we have been in contact regarding fire protection services for the construction of Speedway. At this point in the process, BGTF is not required to have entered into a contract with the Moro Rural Fire Protection District, we just need to demonstrate to ODOE that we have been in consultation with the Moro Rural Fire Protection District and that yes, you are able to provide fire protection services, as well as any constraints you may have (e.g., high angle, confined space rescue). Any letter from you to me on this subject does not constitute a contract and you are under no obligation to provide fire protection services for the facility.

If you could please provide a letter addressing Speedway as soon as possible, that would be greatly appreciated. *It can be a statement on your letterhead with your signature if you like, or even a reply to this email.*

Thank you in advance and let me know if you have any questions!

Kristen Gulick, MS (she/her) | Senior Associate Environmental Scientist/Planner | Tetra Tech

Mobile (541) 740-3316 | kristen.gulick@tetratech.com



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From: [Dana Pursley-Haner](#)
To: [Gulick, Kristen](#)
Subject: Re: Sherman County Emergency Services - Emergency Services for Speedway Energy Facility
Date: Thursday, February 5, 2026 10:12:13 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Hi I thought you got what you needed, Sorry for the misunderstanding.
Sherman County Ambulance would be responding to any emergencies at your facilities in Sherman County,

Dana Pursley-Haner
Sherman County Emergency Services Director

office 541-565-3100
fax 541-565-3240



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From: Gulick, Kristen <Kristen.Gulick@tetrattech.com>
Sent: Wednesday, February 4, 2026 3:53 PM
To: Dana Pursley-Haner <shermanems@shermancounty.net>
Subject: RE: Sherman County Emergency Services - Emergency Services for Speedway Energy Facility

Hi there,
I just wanted to follow up on my initial email. Please let me know what you think!

Thanks in advance,

Kristen Gulick, MS (she/her) | Senior Associate Environmental Scientist/Planner | Tetra Tech
Mobile (541) 740-3316 | kristen.gulick@tetrattech.com



Climate positive and carbon negative by 2030. [Read more](#)



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From: Gulick, Kristen

Sent: Thursday, January 29, 2026 10:12 AM

To: 'shermanems@shermancounty.net' <shermanems@shermancounty.net>

Subject: Sherman County Emergency Services - Emergency Services for Speedway Energy Facility

Hello,

I am contacting you on behalf of the proposed Speedway Energy Facility (Speedway).

Speedway is a proposed 1,400-megawatt wind/solar power generation facility in Sherman County, Oregon owned by BGTF Speedway Project LLC (BGTF). More information on Speedway can be found here: <https://www.oregon.gov/energy/facilities-safety/facilities/Pages/SEF.aspx>

Tetra Tech is under contract to BGTF through the Oregon Dept. of Energy's (ODOE) permitting process. To this end, we will provide to ODOE evidence of consultation with local utilities that we have been in contact regarding emergency services for the construction of Speedway. At this point in the process, BGTF is not required to have entered into a contract with the Sherman County Emergency Services, we just need to demonstrate to ODOE that we have been in consultation with the Sherman County Emergency Services and that yes, you are able to provide emergency services, as well as any constraints you may have. Any letter from you to me on this subject does not constitute a contract and you are under no obligation to provide emergency services for the facility.

If you could please provide a letter addressing Speedway as soon as possible, that would be greatly appreciated. *It can be a statement on your letterhead with your signature if you like, or even a reply to this email.*

Thank you in advance and let me know if you have any questions!

Kristen Gulick, MS (she/her) | Senior Associate Environmental Scientist/Planner | Tetra Tech
Mobile (541) 740-3316 | kristen.gulick@tetrattech.com



Climate positive and carbon negative by 2030. [Read more](#)



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South Sherman Fire District

Mailing: P.O. Box 116

Physical: 412 Mill Street

Grass Valley, OR 97029

admin@southshermanfire.com

www.southshermanfire.com

June 12th, 2026

To Whom It May Concern:

South Sherman Fire & Rescue has met with representatives of Brookfield Renewables N.A. regarding the proposed Speedway Energy Facility in Sherman County, Oregon. As part of those discussions, Brookfield provided information concerning the facility's emergency preparedness measures, including onsite water storage capabilities and wildfire mitigation planning.

Based on the information presented to our agency, the proposed project incorporates dedicated onsite water storage intended to support emergency response operations and provide an additional firefighting resource in the event of a wildfire or facility-related emergency. The availability of onsite water resources can be an important consideration in rural areas where water access may be limited or response times may be extended.

Brookfield Renewables N.A. has also discussed its wildfire mitigation strategy for the Speedway Energy Facility. These measures include vegetation management, maintenance of defensible space around project infrastructure, access road planning, operational protocols during elevated fire weather conditions, and coordination with local emergency responders. South Sherman Fire & Rescue appreciates the applicant's willingness to engage with our department throughout the planning process and to consider local fire protection concerns in the development of the project.

While South Sherman Fire & Rescue does not serve as the permitting authority for this project, we recognize the value of incorporating wildfire prevention and emergency response considerations into facility design and operation. The proposed onsite water storage and wildfire mitigation measures discussed with Brookfield Renewables North America represent positive steps toward reducing wildfire risk and enhancing emergency response capabilities within the project area.

We look forward to continued coordination with Brookfield Renewables N.A. as the project advances and emergency response planning is further developed.

Bert Norris
Fire Chief
South Sherman Fire & Rescue
bnorris@southshermanfire.com



South Sherman Fire District

Mailing: P.O. Box 116

Physical: 109 SW 2nd Street

Grass Valley, OR 97029

admin@southshermanfire.com

www.southshermanfire.com

To Whom It May Concern,

This letter is intended to formally outline the fire protection service area and emergency response capabilities associated with the Speedway Energy Project.

The majority of the Speedway Energy Project is located within the established service area of South Sherman Fire & Rescue (SSF&R). As such, SSF&R would be the primary responding fire agency for incidents occurring within the project boundary.

South Sherman Fire & Rescue is a 100 percent volunteer fire organization. All operational members have been trained to meet Oregon Department of Public Safety Standards and Training (DPSST) Firefighter 1 (FF1) standards. While some members possess experience beyond the FF1 level, SSF&R does not currently have personnel certified in specialized rescue or response disciplines.

Specifically, SSF&R does not have members certified in swift water rescue, high-angle rope rescue, confined space rescue, or hazardous materials operations. Incidents requiring these specialized capabilities would necessitate mutual aid or response from outside agencies with the appropriate training and resources.

This information is provided to ensure an accurate understanding of SSF&R's service area and operational capabilities as they relate to the Speedway Energy Project. We appreciate the opportunity to coordinate early and clearly on emergency planning considerations.

Please feel free to contact us if additional clarification or discussion is needed.

Sincerely,

Bert Norris

Fire Chief
South Sherman Fire & Rescue
503-875-7984

bnorris@southshermanfire.com

Attachment L-4. Draft Road Use Agreement

ROAD USE AGREEMENT

This ROAD USE AGREEMENT (“**Agreement**”) is made and entered into by and among Sherman County, a political subdivision of the State of Oregon (“**Road Authority**”) and BGTF Speedway Project LLC, a Delaware limited liability company (“**Developer**”). Developer and the Road Authority are sometimes referred to herein individually as a “**Party**” and collectively as the “**Parties**.” The term “Developer Representative(s)” shall include Developer’s contractors, sub-contractors, employees, agents, material suppliers, vendors, transport providers, representatives, and designees.

RECITALS

WHEREAS, Developer intends to develop and construct a commercial energy facility in Sherman County, Oregon (“**Project**”); and

WHEREAS, in connection with the construction of the Project, the Parties desire to address certain issues relating to the roads owned, operated and maintained by the Road Authority (collectively, “**Roads**”) over which it will be necessary for Developer and Developer Representative(s) to, among other things: (i) transport heavy equipment and materials over certain Roads, which may in certain cases be in excess of the design limits of the Roads; (ii) transport certain materials such as concrete and gravel, on such Roads; (iii) if necessary, make certain modifications and improvements to the Roads to permit such equipment and materials to pass; and (iv) place certain electrical and communications cables (“**Cables**”) for the Project adjacent to, under or across certain Roads; and

WHEREAS, ORS 368.016 grants the Road Authority jurisdiction over the use, construction, maintenance, access to or repair of the Roads; and

WHEREAS, Developer has prepared and provided to the Road Authority a map showing the Project area and the Roads proposed to be used for construction of the Project, which are attached hereto as Exhibit A (“**Project Maps**”); and

WHEREAS, Developer and the Road Authority wish to set forth their understanding and agreement as to the use of the Roads during the construction of the Project; and

WHEREAS, Developer and the Road Authority acknowledge and agree that this Agreement establishes the rights and obligations of the Parties as they relate to the use of Roads during the construction of the Project.

NOW, THEREFORE, in consideration of the mutual promises and covenants herein set forth, the Parties agree as follows:

Section 1. Developer’s Obligations.

Developer shall undertake the following obligations:

- A. Prior to the start of construction of the Project, Developer shall provide the Road Authority contact information for the Developer's construction manager and Developer's field engineer.
- B. (i) As soon as practical and prior to the commencement of construction of the Project, Developer shall prepare and provide to the Road Authority the Project Maps. The Project Maps shall be subject to review and approval of the Road Authority, and subject to the dispute resolution procedure set forth herein in Section 8.

- (ii) No later than thirty (30) days prior to the commencement of the Project, Developer shall provide the Road Authority with the locations of the following construction-related facilities, as applicable: (a) construction water source(s); (b) aggregate source(s); (c) laydown yards and construction offices; and (d) batch plant facilities, if utilized.
- C. Obtain overweight and oversize vehicle permits as needed and pay permit fees pursuant to the general fee structure established by the Oregon Department of Transportation.
- D. Refrain from using the Roads and the Road rights-of-way as storage, staging or parking areas for Developer's or Developer Representative's vehicles and equipment.
- E. Developer shall, on a daily basis, clear all paved Roads used by Developer or Developer Representative(s) of any mud, dirt, dust, spilled or tracked construction materials, garbage, obstructions or other hazards caused by Developer or Developer Representative(s). All gravel or dirt County roads used by the Developer or Developer Representative(s) shall be inspected and addressed no less than weekly and maintained in good working order.
- F. Repair all Roads that are damaged by Developer or Developer Representative(s) during the construction of the Project and restore such Roads to substantially the same condition they were in prior to commencement of the Project.

- G. Prior to the commencement of hauling operations, document the existing condition of the County roads identified in Exhibit A through photographs and/or video sufficient to establish baseline conditions.
- H. Monitor road conditions for degradation during the Project so that safe travel paths may be maintained. Visual monitoring shall be ongoing as part of daily safety assurance activities. Any degradation shall be documented and promptly repaired so that safe travel paths are maintained for both the public and all Project-related traffic.
- I. Provide written notice to adjacent (within three (1) miles) landowners at least seven (7) days prior to the commencement of construction to minimize access disruptions and provide weekly updates to Road Authority by Thursday of the previous week detailing the work plan for the following week identifying where construction crews will be working and detailing and specific impacts to Roads.
- J. Provide proper road signage and include warnings of “Equipment on Road,” “Truck Access,” or “Road Crossings”.
- K. Implement traffic diversion equipment, such as advance signage and pilot cars, whenever possible when slow or oversized loads are being hauled.
- L. Encourage carpooling for the construction workforce to reduce traffic volume.
- M. Employ flaggers, as necessary, to direct traffic when large equipment is entering or exiting public roads to minimize risk of accidents.
- N. To the extent possible maintain at least one travel lane at all times so that roadways will not be closed to traffic because of construction vehicles entering or exiting public roads. Any potential closures shall require that a Traffic Control Plan be submitted for review and approval by the appropriate regulatory agencies, including Sherman County and Oregon Department of Energy (**ODOE**).
- O. Erect permanent markers indicating the presence of Cables or other underground Project infrastructure, within the Road right-of-way.

Section 2. Road Authority’s Obligations

Road Authority shall undertake the following obligations:

- A. If requested by Developer, cooperate with Developer in obtaining overweight and oversize vehicle permits for Roads.
- B. Perform all routine maintenance on the Roads in accordance with Section 4 of this Agreement.
- C. Review and approve the installation of Cables and other infrastructure for the Project within, across and under the County Roads and Road rights-of-way, in a reasonable manner and in accordance with accepted engineering practices. In the event of any proposed installation of Cables or other infrastructure underneath any Road, Road Authority shall provide Developer or Developer Representative(s) the applicable

form of any application or agreement for any such underground installation(s) and shall promptly review the same.

- D. Provide Developer or Developer Representative(s) with copies of any existing plans, cross-sections and specifications relevant to the existing Road structure, if requested.

Section 3. Road Use

A. Incidental/Accidental Use:

- 1. The Parties recognize that Project traffic may, either through mistake or with the consent of the Road Authority, use roads other than those identified in the Project Map(s). Developer shall be responsible for damage caused by Developer or Developer Representative(s) during such use, whether mistaken or permitted.

Section 4. Maintenance of the Roads

The daily routine maintenance of the Roads, including snow removal, striping, and routine signage and regularly scheduled maintenance, shall be the responsibility of the Road Authority.

Section 5. Emergency Repairs

In the event Developer or Developer Representative(s) cause damage to the Roads of a magnitude sufficiently great to create a hazard to the motoring public, which in the Road Authority's reasonable opinion warrants an immediate repair or Road closing, the Road Authority may close the Road and, following 48 hours' notice to Developer and the opportunity to cure, unilaterally make or authorize such repair. The Road Authority shall document all closure and repair costs and shall photograph, videotape and otherwise document the conditions and make all such documentation available to Developer. The closure and repair costs shall be based on the Road Authority time and material cost records, which shall be made available to Developer for review. Billing rates for labor shall be those established by the Road Authority and for equipment and machinery, those rates approved by the Oregon Department of Transportation or the Federal Highway Administration. Developer shall reimburse the Road Authority for the reasonable, documented cost of such repairs in accordance with the terms of this Agreement.

Section 6. Dispute Resolution Procedure

- A. If the Parties are unable to resolve a disagreement as to: (i) the extent of damages to the Roads, if any, due to construction of the Project; (ii) the method, procedure or design used for the final repair or restoration of the Roads; (iii) the necessity or reasonableness of any emergency repairs performed by the Road Authority for which the Road Authority seeks reimbursement from Developer; or (iv) any other disagreement as to the repair or restoration of the Roads, the Parties shall invoke

the dispute resolution procedure set forth in this Section 8.

- B. The Road Authority and Developer will in good faith attempt to resolve the dispute. If, following such good faith attempt, the Parties are unable to resolve the dispute, the Parties shall select a qualified independent third-party, Oregon-licensed civil engineer to arbitrate the dispute (“**Neutral Engineer**”).
- C. If the Parties cannot agree on a qualified independent third-party Oregon-licensed civil engineer, then each Party shall select a qualified independent Oregon-licensed civil engineer, and those two engineers shall select the Neutral Engineer.
- D. The Parties and the Neutral Engineer shall promptly agree to procedures for submitting position papers and information to the Neutral Engineer and for an on- site inspection (if needed) by the Neutral Engineer. The Neutral Engineer shall complete its review and inspection within 30 business days of its engagement by the Parties and issue its written report.
- E. The determination of the Neutral Engineer shall be binding upon the Parties. The costs for such inspection and report by the Neutral Engineer shall split equally between the Parties. Nothing in this Section 6 shall be construed as a waiver by either Party of its right to bring a claim against the other Party in law or at equity.

Section 7. Mutual Indemnification/Hold Harmless and Liability and Insurance Provisions

- A. Indemnification by Developer. Developer hereby releases and agrees to indemnify and hold harmless the Road Authority and their respective officers, employees, elected or appointed officials, and agents, and their respective heirs, executors, administrators, successors and assigns (collectively, “**Road Authority Releasees**”) from any and all actions, causes of action, suits, claims, expenses (including reasonable attorney’s fees) and demands against the Road Authority Releasees arising out of or relating to the performance by Developer or Developer Representative(s) of their obligations under this Agreement, except to the extent that such liability or loss is due to any negligent or intentional acts of the Road Authority Releasees. More particularly, but without in any way limiting the foregoing, Developer hereby releases the Road Authority Releasees and agrees to indemnify and hold harmless the Road Authority Releasees from any and all actions, causes of action, suits, claims, expenses (including reasonable attorney’s fees) and demands arising directly or indirectly from any personal injury, death or property damage arising out of the use, construction, modifications or repair of the Roads by Developer, its employees, agents, representatives, materials suppliers, vendors, transport providers or contractors, or their respective employees, agents or representatives, except to the extent that such liability or loss is due to any negligent or intentional acts of the Road Authority Releasees.
- B. Indemnification by the Road Authority. The Road Authority hereby releases and agrees to indemnify and hold harmless Developer and their members, officers, directors, contractors, subcontractors, employees and agents, and their respective employees, heirs, executors, administrators, successors and assigns (collectively, “**Developer Releasees**”) from any and all actions, causes of action, suits, claims, expenses (including reasonable attorney’s fees) and demands against the Developer

Releasees arising out of or relating to the performance by the Road Authority of its obligations under this Agreement, except to the extent such liability or loss is due to any negligent or intentional acts of the Developer Releasees. More particularly, but without in any way limiting the foregoing, the Road Authority hereby releases the Developer Releasees and agrees to indemnify and hold harmless the Developer Releasees from any and all actions, causes of action, suits, claims, expenses (including reasonable attorney's fees) and demands arising directly or indirectly from any personal injury, death or property damage arising out of the use, construction, modifications, repair or improvement of the Roads by the Road Authority, their respective employees, agents, representatives, suppliers or contractors, or their respective employees, agents or representatives, except to the extent such liability or loss is due to any negligent or intentional act of Developer Releasees.

- C. Limitations of Liability. In no event shall either Party or their officers or employees be liable (in contract or in tort, involving negligence, strict liability, or otherwise) to the other Party or its contractors, suppliers, employees, members and shareholders for indirect, incidental, consequential or punitive damages resulting from the performance, non-performance or delay in performance under this Agreement.
- D. Required Insurance. Developer shall at all times throughout the term of this Agreement maintain in full force and effect, the following insurance:
1. Worker's compensation and employer's liability insurance covering all employees engaged in the work to the limits required by the applicable laws in the jurisdiction in which the Project is being constructed.
 2. Commercial automobile liability insurance covering all motor vehicles, owned and non-owned, operated and/or licensed or leased by Developer and engaged in the construction of the Project. Limits of liability shall not be less than \$2,000,000 for the accidental injury to or death of one or more persons, or damage to or destruction of property per occurrence.
 3. Commercial general liability insurance with minimum limits of \$2,000,000 per occurrence. Without restricting the generality of the foregoing, such coverage shall include, but not be limited to bodily injury and property damage, sudden and accidental pollution liability (such coverage may be maintained on a standalone basis), products and completed operations and contractual liability. Developer shall provide __Sherman County with additional insured status on the commercial general liability policy.
 4. General provisions applicable to the foregoing insurance requirements:
 - a Developer may use any combination of primary and/or excess insurance to satisfy the above requirements.

- b. Evidence of such insurance shall be submitted to the Road Authority prior to the initiation of any work or transportation of any materials or equipment on the Roads.

Section 8. Miscellaneous Provisions

- A. Remedies and Enforcement. In the event of a material default under this Agreement by a Party (“**Defaulting Party**”), which default is not caused by the Party seeking to enforce the Agreement (“**Non-Defaulting Party**”), the Non-Defaulting Party shall provide the Defaulting Party with at least 60 days’ prior written notice of the default and the reasonable opportunity to cure the default. If the default is not cured by the Defaulting Party within such 60-day period, the Non-Defaulting Party shall have the right of specific performance and injunctive relief. The remedies of specific performance and injunctive relief shall not be exclusive and the Non-Defaulting Party may seek any other remedy available at law or in equity.
- B. Non-Waiver of Performance. Failure of either Party to insist upon the strict and prompt performance of the terms, covenants, agreements and conditions herein contained or any of them upon the other Party imposed, shall not constitute or be construed as a waiver or relinquishment of either Party’s right thereafter to enforce and such terms, covenants, agreements and conditions, but the same shall continue in full force and effect.
- C. Severability. If any provision of this Agreement is held invalid under any applicable law, such invalidity shall not affect any other provision of this Agreement that can be given effect without the invalid provision and, to this end, the provisions hereof are severable.
- D. Amendments. No amendment or modification to this Agreement or waiver of a Party’s rights hereunder shall be binding unless it shall be in writing and signed by both Parties.
- E. Notices. All notices shall be in writing and sent to the Parties at the following addresses (or to such other address as such Party shall designate in writing to the other Party from time to time):

Developer:	BGTF Speedway Project LLC c/o Brookfield Renewable N.A. 200 Liberty St, 14 th Floor New York, NY 10281 Attn: Legal Department Email: legal.department.na@brookfieldrenewable.com
Road Authority:	Sherman County Road Department c/o Mark Coles, Road Master 501 Hood St. Moro, OR 97039 Email: mcoles@co.sherman.or.us

All notices shall be sent via personal delivery, certified or registered mail, or overnight delivery service (e.g. Federal Express). Unless otherwise provided, a notice shall be deemed to be received by a Party (1) on the date of personal service; (2) five calendar days after being sent by registered or certified mail, return receipt requested, postage prepaid, or (3) on the next business day if sent by overnight delivery service (e.g. Federal Express) with all fees prepaid.

- F. Successors and Assigns. This Agreement shall be binding upon all successors and assigns of the Parties.
- G. Counterparts. This Agreement may be executed in any number of counterparts, each of which shall be deemed an original, with the same effect as if the signatures thereto and hereto were upon the instrument. Delivery of an executed counterpart of a signature page to this Agreement by electronic means shall be as effective as delivery of a manually signed counterpart to this Agreement.
- H. Governing Law. This Agreement shall be governed by and interpreted in accordance with the laws of the State of Oregon.
- I. Termination. In the event Developer does not construct the Project, Developer shall have the right to terminate this Agreement by providing 30 days' prior written notice to the Road Authority. In the event that Developer breaches this Agreement, Road Authority shall have the right to terminate this Agreement upon 30 days' written notice to Developer. This Agreement shall otherwise terminate upon Developer's completion of post-construction repairs of the Roads and the release of the Surety Bond.
- J. Entire Agreement. This Agreement contains the entire understanding of the Parties as to the matters set forth herein, and this Agreement supersedes any prior agreements or understandings by and between Parties, whether written or oral.
- K. Recitals. The Recitals made herein are true and correct and are hereby incorporated as part of this Agreement.
- L. Assignment. This Agreement may not be assigned by Developer without the prior written consent of the Road Authority, which shall not be unreasonably withheld.

IN WITNESS WHEREOF, on the date noted below the Parties have caused the Agreement to be executed by their duly authorized officers.

ROAD AUTHORITY:

SHERMAN COUNTY

a political subdivision of the State of Oregon

By:

Name: _____

Title: County Road Master

SHERMAN COUNTY

a political subdivision of the State of Oregon

By:

Name: _____

Title: County & Juvenile Court Judge

IN WITNESS WHEREOF, on the date noted below the Parties have caused the Agreement to be executed by their duly authorized officers.

Developer:

BGTF Speedway Project LLC

By:

Name: _____

Title: Authorized Representative

Exhibit A

Project Map(s)

Attachment L-5. Component Coordinates and Elevations Table

Component Coordinates and Elevations Table

Turbine Number	Latitude	Longitude	Site Elevation (feet)
1	45° 15' 38.45 N	120° 50' 40.53 W	2281
2	45° 15' 43.30 N	120° 49' 41.04 W	2281
3	45° 16' 07.01 N	120° 49' 30.47 W	2299
4	45° 16' 07.99 N	120° 50' 34.87 W	2302
5	45° 16' 15.61 N	120° 48' 24.18 W	2281
6	45° 16' 22.36 N	120° 49' 37.48 W	2341
7	45° 16' 34.35 N	120° 48' 25.52 W	2325
8	45° 16' 34.85 N	120° 47' 31.52 W	2338
9	45° 16' 38.83 N	120° 49' 46.67 W	2347
10	45° 16' 41.21 N	120° 50' 40.65 W	2318
11	45° 16' 45.51 N	120° 46' 22.49 W	2418
12	45° 16' 46.43 N	120° 51' 13.51 W	2321
13	45° 16' 54.31 N	120° 51' 52.55 W	2311
14	45° 16' 55.29 N	120° 48' 25.00 W	2330
15	45° 16' 58.47 N	120° 47' 40.18 W	2364
16	45° 16' 59.86 N	120° 49' 39.66 W	2357
17	45° 17' 09.30 N	120° 50' 53.39 W	2345
18	45° 17' 12.09 N	120° 50' 00.09 W	2340
19	45° 17' 19.90 N	120° 51' 11.76 W	2340
20	45° 17' 20.40 N	120° 46' 52.58 W	2378
21	45° 17' 22.81 N	120° 47' 59.93 W	2358
22	45° 17' 29.79 N	120° 47' 08.55 W	2368
23	45° 17' 30.86 N	120° 49' 58.30 W	2341
24	45° 17' 38.14 N	120° 48' 15.12 W	2396
25	45° 17' 52.71 N	120° 47' 02.50 W	2393
26	45° 17' 54.44 N	120° 48' 21.20 W	2397
27	45° 17' 58.07 N	120° 49' 36.23 W	2368
28	45° 17' 59.40 N	120° 48' 45.71 W	2359
29	45° 18' 59.29 N	120° 47' 05.35 W	2422
30	45° 19' 07.41 N	120° 47' 30.90 W	2415
31	45° 19' 25.05 N	120° 47' 36.89 W	2391
32	45° 19' 52.23 N	120° 47' 37.14 W	2403
33	45° 20' 14.22 N	120° 47' 04.65 W	2404
34	45° 20' 24.80 N	120° 45' 57.97 W	2427
35	45° 20' 50.12 N	120° 45' 02.99 W	2400
36	45° 20' 50.28 N	120° 43' 41.42 W	2306
37	45° 21' 03.69 N	120° 43' 37.20 W	2275

**Preliminary Application for Site Certificate
Attachment L-5.**

Turbine Number	Latitude	Longitude	Site Elevation (feet)
38	45° 21' 07.33 N	120° 45' 00.84 W	2380
39	45° 21' 15.42 N	120° 43' 26.64 W	2257
40	45° 21' 22.20 N	120° 44' 52.32 W	2363
41	45° 21' 42.91 N	120° 41' 09.57 W	2323
42	45° 22' 00.75 N	120° 41' 07.82 W	2273
43	45° 22' 08.60 N	120° 40' 23.39 W	2312
44	45° 22' 11.78 N	120° 42' 12.72 W	2249

Attachment L-6. Draft Operations Emergency Response Plan

Operations Emergency Response Plan

Speedway Energy Facility



Speedway Energy

BGTF Speedway Project LLC

July 2026

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Introduction

BGTF Speedway Project LLC (the “Certificate Holder” or “BGTF Speedway Project LLC.”) has constructed and now owns and operates the Speedway Energy Facility (the “Facility”), a solar, wind, and BESS facility in Sherman County. The Certificate Holder has developed this Emergency Response Plan for use during the operations phase of the project to meet the following criteria:

The Certificate Holder shall prepare and submit an Emergency Response Plan to EFSC for review prior to the start of commercial operations.

EFSC and the Certificate Holder shall solicit review by applicable local and state emergency service providers with jurisdictions that overlap the facility location.

This plan is intended to be a living document so it and any updates will be provided to the local Emergency Services, including the South Sherman Fire & Rescue Dept, the Moro Fire District, Sherman County Sheriff’s Office, and other services listed in Appendix A, both to apprise them of the ongoing operations of the facility and to enable them to formulate their own response plan. Prior to commercial operations the local Emergency Services will be invited to visit and make their own assessment of the site, which we will continue to facilitate as additional requests arise.

Project Description

BGTF Speedway Project LLC proposes construction and operation of the Speedway Energy 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 primary transportation route to the Facility will follow I-84, then turn south on US Highway 97 at Biggs Junction, and then south into the site boundary using a variety of existing roads including Sherars Bridge Highway/State Route 216 (OR-216) and other existing county roads. Multiple county roads within the site boundary will be used to access new and existing roads within the Facility. Access to the wind turbine sites, solar arrays, collector substations, BESS areas, O&M areas, and central substation will be via a network of existing or new access roads to be constructed or improved as part of the Facility’s construction. 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. Each solar array, battery

energy storage system area, operations and maintenance area, and Facility substation will be individually fenced with access gates for authorized personnel.

Emergency Information

Facility Address: official.address.to.be.determined

Brookfield Primary Emergency Coordinator (on-site) – to.be.determined

Brookfield Operations Manager – Mario Varela (661) 406-7469

Emergency Equipment on Site

Each owners or owner's contractor vehicle, or any equipment necessary for O&M activities, will be equipped with a fire extinguisher and a first aid kit that will be inspected annually.

At the onsite O&M buildings the following will be present:

- First Aid Kit in each operations building
- Replacement First Aid Kits for vehicles
- Eye Wash Station
- AED (defibrillator) in each operations building

Emergency Response Procedure

Emergency response will be conducted with safety of the individual worker as the highest priority. Individuals that are trained in first aid will be called upon to administer it, as appropriate, if a medical emergency is detected on site. As is standard with implementation of first aid it will be done in parallel with the actions outlined in the Notification Procedure, as follows. If the medical emergency is the result of site conditions (e.g., a spill or safety hazard), those conditions will be isolated, in accordance with governing plans, in order to ensure the safety of all workers. For all emergencies the Notification and Stop Work actions, listed below, will be employed as described.

Notification Procedure

All emergency situations should immediately be reported. In the event of an emergency the workers will exit the work area and will not attempt to deal with emergency other than the protection of life & limb. The employees will muster to the designated rally areas and take a

headcount to see that all employees have exited the project area. The following 7-step Emergency Notification Procedure should be used:

1. Notify 911 Immediately

Give the site name, address, and directions to the operator, as well as describe the emergency.

If calling from a mobile phone, be sure to check that you are talking to Sherman County 9-1-1 (Frontier Regional 911). Give the site name, address, and directions to the Facility to the operator, as well as describe the emergency as detailed below.

2. Describe the type of emergency

Typically, the categories include:

- a. Medical Emergency
- b. Construction/Equipment Emergency
- c. Site Location Evacuation
- d. Fire Protection and Prevention
- e. Flooding
- f. Extreme Weather abnormalities
- g. Earthquake
- h. Volcanic Eruption
- i. Facility Blackout
- j. Hazardous Materials Spills
- k. Terrorism, Sabotage, or Vandalism
- l. Bomb Threat

When describing personnel involved (medical emergency), indicate the numbers affected and the following initial assessment:

- a. Fatality
- b. Major Illness (heart attack, not breathing, unconscious, etc.)
- c. Major Injury (broken bone, loss of limb, severe cuts/bleeding, etc.)
- d. Minor Injury (twisted ankle, foreign body in eyes, minor cuts, etc.)
- e. Bite/Sting (snake, scorpion, etc.)
- f. Weather Effect (effects of heat, sun, cold, wind chill, lightning strike, etc.)
- g. Incident Type (fall, crush, vehicle crash, fire, electric shock, etc.)

3. Location

Give the operator the location of the emergency, using the physical address of to.be.determined 98936 in Sherman County.

4. Notify Supervisor

Contact the nearest site supervisor, and then your own supervisor. For non-urgent medical attention, the supervisor should arrange for site transport to take the injured to the hospital and notify the hospital that they are on their way. The nearest hospital with an E.R. is Mid-Columbia Medical Center in The Dalles, which is 55 miles from the Facility (See Appendix A for map and written directions). For care that does not require a hospital visit there is the Sherman County Medical Clinic in Moro, which is 10 miles from the Facility via US-97N.

5. Notify Certificate Holder

Onsite personnel will contact a Certificate Holder supervisor (see Appendix C) who will assist at the location of the emergency. It is expected in most cases a Certificate Holder supervisor or employee will be the personnel on site. In most cases there will be limited site presences, typically XX personnel. Supervisors will be directly involved in or will arrange for a staff person trained in first aid to attend the scene of the emergency, if required. The names of all staff trained in first aid will be known, anytime personnel are on site.

6. Coordinate

The supervisor(s) will send an employee to the site access point to meet the emergency services, and escort them to the location of the emergency.

7. Accompany

The supervisor(s) will continue to assist with the situation on site, and one of the supervisors will accompany any injured personnel to the hospital. The employer can later require the injured to make an appointment to see a health care provider if confirmation of the extent or nature of injuries, treatment or disability is required.

STOP WORK!

Work will not resume until the accident is reported and corrective measures are taken.

Site Evacuation Procedure

1. Personnel empowered to order evacuation/shutdown of the site are:
 - a. Supervisors of individual contractors, who may instruct their own people to evacuate.
 - b. Speedway Energy Facility supervisors, who may instruct ALL personnel to evacuate.
2. When instructed, evacuate site via access to US-97.
3. In case of fire, try to remain upwind of it.

Fire Prevention Procedures

Separate Construction and Operational Wildfire Mitigation Plans have been developed for this Facility, in view of the fire risk posed by the natural vegetation and climate.

Severe Weather Conditions

A current understanding of daily weather conditions will be reviewed during each morning safety briefing and work schedules will be adjusted as needed, if severe weather is expected. Weekly weather outlooks will be tracked by the Operations Manager to plan ahead for any predicted severe weather events (e.g., thunderstorms, extreme heat).

Severe weather conditions, particularly gusting high wind speed and electrical storms, may have a pronounced effect on the maintenance activities. Due diligence should be proactive with routine observation by all concerned about obvious local changing atmospheric conditions that could indicate deteriorating weather conditions. In such cases of severe weather, the supervisor may require all activities to stop and evacuate the vicinity until weather conditions subside. In that case the Site Evacuation Procedure outlined above will be followed. The Site Evacuation Procedure may be modified on-site in response to severe weather or extreme weather abnormalities that arise suddenly, in order to keep workers safe.

Earthquake, Volcanic Eruptions, Flooding

Natural disasters like earthquake, volcanic eruption, and flash flood occur without warning. In such cases it is important that the site be evacuated with all possible haste. All site personnel should move away from the location of the event and get to a safe distance and location. It is essential to remain calm and do not panic. Once personnel are safe Emergency Services will be contacted and the site supervisor or company headquarters will be contacted to enable a roll call and for authorities to establish numbers of survivors and assess those who are not accounted for.

If the facility is intact and other safety issues are under control, Site Supervisor may approve re-entry of personnel for search and rescue efforts.

Hazardous Materials Spills

A separate operations spill prevention, control and countermeasures plan (SPCC) has been developed to address those issues in detail. Please refer to that plan for more detailed instructions regarding spill prevention and response.

In the event of a spillage of a hazardous or potentially hazardous substance: Initiate the oil spillage procedure after checking:

- Type of oil or hazardous substance involved
- Estimated quantity of spillage
- Fire Risk
- Safety Data Sheets (SDS)/Material Safety Data Sheets recommendations and considerations (See the Facility Spill Prevention Plan, under separate cover).
- Inform the closest site supervisor, organize deployment of the site emergency spill kit and refer to the SPCC.

Acts of Terrorism, Sabotage, Vandalism, or Bomb Threat

With potentially increased levels of terrorist activity on mainland USA, it has become essential that all companies consider the implications to the health and safety of their staff should a terrorist attack occur in the workplace. The primary concerns are threatened bombing attacks and the potential for chemical or biological attack. The Sherman County Sheriff's Office has law enforcement authority over the site and is responsible for assuming control of response actions.

If an act of terrorism comes without prior warning, or in the case that an incident is subsequently found to be caused by vandalism or sabotage, the Operations Emergency Plan will be brought into effect to mobilize the appropriate emergency services.

If a bomb threat call is received, the main objective is to record every word of the threat message accurately and obtain as much information as possible from the caller. To this end, the following questions should be asked:

- When will the bomb go off?
- Where is the bomb?
- What type of bomb is it?
- What does it look like?
- When was it put there?
- Why are you doing this?
- Who are you?

While talking to the person, try to determine:

- The sex of the caller
- The style of speech
- The accent and mannerisms of the caller

- Listen for background noises that could be helpful to an investigator

After receiving the call, the recipient will then:

- Contact the Site Supervisor, or
- Dial 911 and inform the Sherman County Sheriff's Office

Site Supervisor should:

- Make sure the Sherman County Sheriff's Office has been informed.
- Ensure immediate evacuation of the area of the bomb's supposed location, and the surrounding areas.
- Prepare to implement the Evacuation Procedure for entire facility, if necessary.
- Prepare relevant documentation to assist in assessing the situation with police and authorities – situational information gathered from the individual when the threat was received, information such as the number of persons at each site location, site maps, plans of related buildings and equipment, etc.
- Coordinate and supply support to the Sherman County Sheriff's Office, as requested.

Whether the threat is received in writing or in person, the same procedure should be followed as far as possible.

It is difficult to have a contingency plan that takes into consideration all the possibilities that avoid the consequences of a Chemical or Biological attack, however, should a warning or threat be issued, the identical procedure should be applied as that used for a Bomb Threat. Leaving the area is even more imperative. Keeping your body covered as far as possible to avoid any skin contact with the threatened substance is a priority. Covering the nose and mouth to avoid inhalation is also a must.

If a letter or parcel is used to spread the noxious medium, all site personnel should be vigilant in their examination of suspicious or unsolicited deliveries. If there are any doubts as to the content of a letter or parcel, and if the senders' address and the postmark do not match, the item should be treated as suspect and the authorities contacted to examine the piece under controlled conditions.

The Site Supervisor cannot completely mitigate for the malicious actions of others, but all site personnel should maintain a heightened state of awareness to protect themselves and their colleagues at work.

DO NOT APPROACH, TOUCH OR ATTEMPT TO REMOVE ANY SUSPICIOUS OBJECT OR DEVICE.

Plan Holders

This plan will be held both by the on-site supervisor and any crew supervisors charged with executing emergency orders to a crew during operational activities. In addition, copies have been sent to South Sherman Fire & Rescue Dept, the Moro Fire District, Sherman County Sheriff's Office, and other services listed in Appendix A. The Emergency Plan shall be held on-site and the Concise Emergency Plan at the end of the document will be held in each vehicle on-site.

Post-Incident Review of Response Procedure

At the site safety meeting following an emergency response incident, the Certificate

Holder will review how successfully the Emergency Response Plan was implemented. Following this review, actions will be taken to correct any deficiencies, either by improved communication of the Emergency Response Plan or by modification to the Plan.

Talking to News Reporters

In any event, no personnel or subcontractors will speak to the media. Only the Speedway Energy Facility Operations Manager or a representative from the Speedway Energy Facility office, are authorized to make any public statement regarding an incident.

Appendix A

Summary of Emergency Services for Speedway Energy Facility

All Emergency Services – Dial 911

Frontier Regional 911 - Processes all emergency 911 calls

Fire & Rescue Non-Emergency Line Frontier Regional Dispatch (541) 384-2080

South Sherman Fire & Rescue – Dial 911

109 SW 2nd St, Grass Valley, OR 97029

Administrative Number: (541) 333-2525

Sherman County Sheriff's Office - Dial 911

Sheriff James Burgett

500 Court St, Moro OR 97039

Administrative Number: (541) 565-3622

Mid-Columbia Medical Center

Nearest 24/7 Hospital with ER capability that can be reached by car

1700 E19th St, The Dalles, OR 97058

Administrative Number: (541) 296-1111

Harborview Medical Center

Nearest Hospital for head injuries, severe burns and serious trauma

325 Ninth Avenue, Seattle, WA 98104-2420

Dial (206) 731-3000

<https://www.uwmedicine.org/Facilities/Harborview>

Map of Facility Site to Mid-Columbia Medical Center – Travel Time 55 Minutes



Written Directions from Speedway Energy Facility to Mid-Columbia Medical Center

- Turn left onto US-97 N/Mill St and continue to follow US-97 N (27.4 mi)
- Turn left to merge onto I-84 W toward The Dalles (18.9 mi)
- Take exit 85 toward The Dalles/City Ctr (0.2 mi)
- Turn left onto Brewery Overpass Rd (0.2 mi)
- Turn right onto US-30 W (0.2 mi)
- At the traffic circle, take the 2nd exit onto Brewery Grade (0.3 mi)
- Turn left onto E 9th St (144 ft)
- Turn right onto Dry Hollow Rd (0.3 mi)
- Turn left onto E 14th St (46 ft)
- Turn right onto Montana St (266 ft)
- Turn left onto E 15th St (243 ft)
- Turn right onto Nevada St (0.2 mi)
- Turn right onto E 19th St (157 ft)
- Turn left (397 ft)
- Turn right (66 ft)
- Turn left, and the destination will be on your right (62 ft)

Appendix B

Other Useful Contacts:

Spill Reports – National Response Center: (800) 424-8802

Spill Reports – Oregon Emergency Response System: (800) 424-8802

American Red Cross - <https://www.redcross.org/>

Centers for Disease Control <https://www.cdc.gov/>

Department of Homeland Security - <https://www.ready.gov/>

Federal Emergency Management Agency (FEMA) - <https://www.fema.gov/>

National Weather Service - <https://www.weather.gov/>

Pacific Northwest Seismic Network - <https://pnsn.org/earthquakes/recent>

Oregon Health Authority - <https://www.oregon.gov/oha/Pages/index.aspx>

Department of Homeland Security – <http://www.dhs.gov/dhspublic/>

Federal Emergency Management Agency (FEMA) – <http://www.fema.gov/>

Occupational Safety & Health Administration (OSHA) – <http://www.osha.gov/>

Oregon OSHA - <https://osha.oregon.gov/rules/pages/default.aspx>

United States Geological Survey - <https://www.usgs.gov/>

Following a major disaster, first responders who provide fire and medical services cannot always meet the substantially increased demand for their services. Factors such as number of victims, communication failures and road blockages can prevent people from immediately accessing emergency services through 911.

Appendix C

Speedway Energy Facility CONCISE EMERGENCY PLAN HOW TO DEAL WITH AN EMERGENCY SITUATION

Use these notes in case of injury, illness or fire, and also in case of evacuation.

*** ALWAYS KNOW YOUR LOCATION ***

In case of INJURY or ILLNESS:

1. Call 911. Give location of the emergency and describe the injury or illness.
2. Notify a supervisor. All supervisors carry a cell phone or a two-way radio.
Describe the emergency to the supervisor.

Speedway Energy Facility Supervisor: NAME / PHONE
Brookfield Primary Emergency Coordinator – To be determined
Brookfield Operations Manager – To be determined
Brookfield Manager, HSS&E – To be determined
Brookfield Asset Manager – To be determined

3. Dispatch SOMEONE ELSE to the entrance to meet and escort the emergency services to your location. You STAY WITH THE CASUALTY.
4. You (or supervisor) go with the casualty to the hospital.

In case of FIRE:

- 1) Call the fire department by dialing 911 and give the location of the fire.
- 2) Notify supervisors (as above).
- 3) Immediately clear the area of all personnel and, if possible, vehicles and flammables. If you are trained in fire safety, and the fire is small, attempt to put the fire out with an extinguisher. DO NOT PUT YOURSELF AT RISK.
- 4) Await the arrival of the fire department.

In case of SEVERE or EXTREME WEATHER, ACTS OF SABOTAGE or
TERRORISM or MAJOR INCIDENT:

- 1) Prepare to evacuate the site. Supervisors will initiate and coordinate the evacuation. FOLLOW THEIR INSTRUCTIONS.

In any emergency situation, keep calm and don't panic. Give clear, concise information and directions. The attached map shows the layout of the roads and Facility, and the nearest emergency site exit and assembly points.