Request for Amendment 5 for the Biglow Canyon Wind Farm

Exhibit D. Land Use

Submitted to
Oregon Energy Facility Siting Council

Prepared for

Portland General Electric Company

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AC	alternating current
AVA	American Viticulture Area
BCWF or Facility	Biglow Canyon Wind Farm
BESS	battery energy storage system
BIGL 2 or Project Developer	BIGL 2, LLC
BMP	best management practice
BPA	Bonneville Power Administration
Certificate Holder or PGE	Portland General Electric Company
Council or EFSC	Oregon Energy Facility Siting Council
EFU	exclusive farm use
ESCP	Erosion and Sediment Control Plan
F-1	Exclusive Farm Use (zone)
FEMA	Federal Emergency Management Agency
gen-tie	generation tie
I	Interstate
kV	kilovolt
LCDC	Land Conservation and Development Commission
LGIA	large generator interconnection agreement
LOS	Level of Service
MW	megawatt
MWh	megawatt-hour
NH	Natural Hazards (Combining zone)
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
OR	Oregon State Route
ORS	Oregon Revised Statute
OWRD	Oregon Water Resources Department
PILOT	Payment in Lieu of Taxes
POI	point of interconnect
PV	photovoltaic
RFA	Request for Amendment

Acronym/Abbreviation	Definition
SCCP	Sherman County Comprehensive Plan
SCZO	Sherman County Zoning Ordinance
Site Certificate	Site Certificate on Amendment 4
Solar Facility	solar energy generation and battery storage components
TSP	Transportation System Plan
US	U.S. Highway
V/C Ratio	Volume to Capacity ratio
WMP	Wildfire Mitigation Plan

1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) submits this Request for Amendment (RFA) 5 to the Site Certificate on Amendment 4, issued March 27, 2026 (Site Certificate) for the Biglow Canyon Wind Farm (BCWF or Facility) to add a second phase of solar photovoltaic (PV) energy generation and battery storage capacity to the BCWF following the solar power generation and battery storage capacity approved under RFA 4.

BCWF, owned and operated by PGE, is located within an approved site boundary comprising approximately 25,000 acres, approximately 2.5 miles northeast of the town of Wasco in Sherman County, Oregon (Background Exhibit Figure 1). The BCWF operates under the Site Certificate from the Oregon Energy Facility Siting Council (Council or EFSC) as administered by the Oregon Department of Energy (ODOE). BCWF currently consists of 217 operating wind turbines, with a maximum blade tip height of 445 feet, and a peak generating capacity of 450 megawatts (MW) (Wind Facility). RFA 4, approved March 27, 2026, added 125 MW alternating current (AC) generating capacity from PV solar arrays and 500 megawatt-hours (MWh) in battery storage capacity. The solar energy generation and battery storage components (Solar Facility) described in RFA 4 are currently under construction.

In RFA 5, PGE proposes to amend the approved Facility to include the addition of:

- "Solar Components," consisting of up to 200 MW AC generating capacity from PV solar generation with up to 1,000 MWh in battery storage capacity and associated collection, electrical, operations, maintenance, and supporting facilities, located within the defined Solar Siting Area; and
- "Gen-tie line," consisting of approximately 2.7 miles of 230-kilovolt (kV) transmission line, located outside the Solar Siting Area and within the Transmission Corridor.

The RFA 5 Site Boundary encompasses both the Solar Siting Area and the Transmission Corridor, which together total approximately 1,461 acres, including approximately 622 acres within the currently approved BCWF site boundary and 839 acres in the proposed expanded site boundary (see Background Exhibit Figure 4). The Solar Siting Area is approximately 1,244 acres and represents the anticipated disturbance footprint of the Solar Components, in addition to additional permanent disturbance associated with other components of the RFA 5 Solar Facility, that together constitute the permanent disturbance within the RFA 5 Site Boundary.

The gen-tie line, as directed by EFSC, is treated as a utility facility necessary for public service pursuant to Oregon Revised Statutes (ORS) 215.283(c) and must comply with the standards of ORS 215.274 or 215.275. Compliance with ORS 215.274 is discussed in Section 5.4.1 below.

PGE will own and operate the RFA 5 Solar Facility as a part of the BCWF, which, to date, has been developed by BIGL 2, LLC (BIGL 2, or Project Developer). BIGL 2, in its capacity as the Project Developer, supports PGE in this RFA 5 and may construct and temporarily operate the Solar Facility as amended by RFA5 on behalf of PGE under a Build-Transfer Agreement. This Exhibit D was

prepared to meet the submittal requirements in Oregon Administrative Rules (OAR) 345-022-0030. Sections of OAR 345-022-0030 that do not apply to the proposal have been omitted from this exhibit.

To issue a site certificate, the Council must find that the facility complies with the Statewide Land Use Planning Goals adopted by the Land Conservation and Development Commission (LCDC). See OAR 345-022-0030(1). The Certificate Holder has elected to seek a Council determination of compliance under ORS 469.504(1)(b). Under this election, a finding of compliance is required when the Council determines the following:

> *ORS 469.504(1)(b)(A) The facility complies with applicable substantive criteria from the affected local government's acknowledged comprehensive plan and land use regulations that are required by the statewide planning goals and in effect on the date the application is submitted, and with any Land Conservation and Development Commission administrative rules and goals and any land use statutes that apply directly to the facility under ORS 197.646;*
>
> *ORS 469.504(1)(b)(B) For an energy facility or a related or supporting facility that must be evaluated against the applicable substantive criteria pursuant to subsection (5) of this section, that the proposed facility does not comply with one or more of the applicable substantive criteria but does otherwise comply with the applicable statewide planning goals, or that an exception to any applicable statewide planning goal is justified under subsection (2) of this section; or*
>
> *ORS 469.504(1)(b)(C) For a facility that the council elects to evaluate against the statewide planning goals pursuant to subsection (5) of this section, that the proposed facility complies with all applicable statewide planning goals or that an exception to any applicable statewide planning goal is justified under subsection (2) of this section.*

Exhibit D demonstrates RFA 5's compliance with the applicable substantive criteria from the Sherman County Zoning Ordinance (SCZO; Sherman County 2003) and the Sherman County Comprehensive Plan (SCCP; Sherman County 2007). In addition, Exhibit D demonstrates RFA 5's compliance with the LCDC administrative rules and goals and any land use statutes directly applicable to the Solar Components. Exhibit D also demonstrates that a "reasons" exception to Statewide Planning Goal 3, Agricultural Lands, is justified under ORS 469.300. Finally, Exhibit D provides evidence upon which the Council may find that the Solar Components meet OAR 345-022-0030.

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

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

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

See sections below as the information contained herein supports demonstration of compliance with the Land Use approval standard for OAR 345-022-0030.

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

3.1 RFA 5 Solar Facility Overview

The RFA 5 Solar Facility includes individual components and related or supporting facilities and is described in detail in the Background Exhibit. As discussed in Background Exhibit Section 3, the Certificate Holder is requesting to permit a range of PV and associated or supporting facility technology within the RFA 5 Site Boundary. Together, the Solar Components and the gen-tie line comprise the RFA 5 Solar Facility, and their associated footprints (Solar Siting Area and Transmission Corridor, respectively) are located within the RFA 5 Site Boundary.

3.1.1 Solar Components

As discussed in Section 5.4.3 of this exhibit, the proposed solar array and associated facilities (i.e. the Solar Components) meet the definition of "photovoltaic solar power generation facility" subject to OAR 660-033-0130(38). The Solar Components include the solar arrays, inverters, battery energy storage system (BESS) facilities and their subcomponents (i.e., inverters), collector substation, medium-voltage collector lines, operations and maintenance (O&M) structures, site access roads, internal roads, perimeter fencing, facility entry gates, and temporary laydown areas. The Solar Components do not include the gen-tie line, as discussed in Section 3.1.2.

For purposes of Goal 3 exception analysis (see Section 5.6), the Certificate Holder considers a permanent impact area of the Solar Components that will occupy up to approximately 1,244 acres enclosed within the Solar Siting Area. This entire permanent impact area is considered permanently disturbed and includes the Solar Components (see Background Exhibit Figure 2). However, within the overall footprint, actual fencing of individual components may be different than shown. All temporary disturbance areas are outside the fenced areas. This layout represents the maximum impact scenario for purposes of analyzing land use impacts specific to the RFA 5 Site Boundary (see Background Exhibit Figure 2). More details can be found throughout the Background Exhibit.

3.1.2 Gen-tie Line

The proposed gen-tie line is not included in the definition of "photovoltaic solar power generation facility" per OAR 660-033-0130(38)(f). Instead, as directed by EFSC, the proposed gen-tie line falls within the *utility facility necessary for public service* use category provided under ORS 215.283(1)(c) and must comply with the standards of ORS 215.275 or 215.274. Compliance with ORS 215.274 is

discussed in Section 5.4.1 below. The gen-tie line is located within a transmission corridor where it is not located within the Solar Siting Area as shown on Figure D-1.

3.2 Overview of Existing Land Uses

The zoning designations, underlying land uses, and soil classifications within the RFA 5 Site Boundary and analysis area are relevant for purposes of analyzing RFA 5's compliance with applicable substantive criteria and directly applicable state land use regulations. Zoning designations are discussed in Section 5.0. Existing land uses are discussed in this section, while farmland characteristics, including water rights, soil classifications, and high-value farmland, are discussed in Section 3.3. The four tracts within the RFA 5 Site Boundary will contain solar arrays. Per OAR 660-033-0020(14), "tract" means one or more contiguous lots or parcels under the same ownership. The tracts are mapped in Figure D-3. Compliance with applicable substantive criteria is discussed in Sections 5.2 through 5.3, and compliance with directly applicable state land use regulations is discussed in Section 5.4.

3.2.1 Cultivated Lands

As shown on Figure D-4, almost the entirety of the land use analysis area is composed of cultivated land. These cultivated lands are a mix of summer fallow fields and fields in small grain production, primarily dryland wheat (soft white winter wheat). There are no irrigated lands within the Solar Siting Area (see place of use water rights in Figure D-5). More information regarding soil productivity, irrigation water rights, diking districts and irrigation districts, and existing agricultural uses located within the Solar Siting Area and analysis area is discussed in Section 3.3. Exhibit G and Figure G-2 provide more details on the surveyed habitats and ground cover within the Solar Siting Area.

3.2.2 Surrounding Energy Facilities

As shown on Background Exhibit Figure 4, the RFA 5 Site Boundary is within proximity of multiple renewable energy projects, including Klondike III Wind Project, Golden Hills Wind Project, Leaning Juniper IIA Wind Power Facility, Summit Ridge Renewable Energy Facility, and the RFA 4 Solar Components for BCWF. Transmission lines operated by the Bonneville Power Administration (BPA), PaTu Wind Farm LLC, and PacifiCorp all connect to the existing Biglow Canyon Substation connecting the point of interconnect (POI) to the regional electrical grid. As shown in Figure D-3, other non-EFSC solar and wind projects are also located within 2 miles of the Solar Siting Area: the six-turbine PaTu wind farm is located within the analysis area and approximately 0.4 miles southeast of the Solar Siting Area, and the existing 90-acre Wy'East solar facility is located outside of the analysis area and approximately 1.8 miles southeast of the Solar Siting Area.

3.3 Farmland Characteristics

To support the responses to the applicable substantive criteria under OAR 660-033-0130(38) (see Section 5.4.3), this section describes the factors that influence whether the land within the Solar

Siting Area meets the definition of arable land under OAR 660-033-0130(38)(a) and/or meets the definition of high-value farmland under ORS 195.300(10). These factors include:

- Whether the land is within a place of use for a permit, certificate, or decree for the use of water for irrigation issued by the Oregon Water Resources Department (OWRD) or is within the boundaries of an irrigation district (as defined under ORS 540.505);
- Whether the land is currently irrigated or has water rights sufficient to support irrigation;
- Whether the land in a tract is predominantly composed of soils that are irrigated or not irrigated and classified by the Natural Resources Conservation Service (NRCS) as prime, unique, Class I or Class II (for high-value soils) or predominantly cultivated or composed of soils that are irrigated or not irrigated and classified by the NRCS as Class III or IV (for arable soils); and
- Whether the land is located within the Columbia Valley American Viticulture Area (AVA), as described in 27 Code of Federal Regulations 9.74 and meets the elevation, aspect, and slope criteria listed under ORS 195.300(10)(f).

The following subsections investigate each of these factors as they apply to the Solar Siting Area and analysis area.

3.3.1 Existing Water Rights

As shown on Figure D-5, there are no irrigation water rights within the Solar Siting Area or analysis area. None of the land within the Solar Siting Area or analysis area is included within the boundaries of an irrigation or diking district. Furthermore, there are no irrigation water rights in the RFA 5 Site Boundary.

3.3.2 Soil Classifications

The NRCS geographic information system soil data indicate the Solar Siting Area comprises four soil types (NRCS 2026; see Table D-1 below). The NRCS database includes the physical and chemical properties of the soils in the Solar Siting Area and the soil map unit distribution. The NRCS assigns land capability classifications to each soil unit to show, in a general way, the suitability of soils for most kinds of field crops. Soils are grouped according to their limitations for field crops, the risk of damage if they are used for crops, and the way they respond to management (NRCS 2026). Soil classifications can depend on whether the soils are irrigated. As discussed in Section 3.3.1, there are no irrigation water rights within the Solar Siting Area. Therefore, only the non-irrigated NRCS capability classification applies to the soils in the Solar Siting Area. Figure D-6 shows NRCS soil capability classes within the analysis area and Solar Siting Area for non-irrigated capability classes.

In addition to the soil capability classifications, the NRCS assigns farmland classifications to map units as prime farmland, prime farmland if irrigated, farmland of statewide importance, farmland of local importance, or unique farmland. Farmland classifications identify the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops (NRCS 2026). Soils in the Solar Siting

Area are classified by the NRCS as either prime farmland if irrigated or farmland of statewide importance (see Table D-1).

NRCS also assigns capability subclasses for each soil unit. All four of the soils listed in Table D-1 are assigned "e" capability subclass, which indicates that the main hazard to the soils is the risk of erosion unless close-growing plant cover is maintained (NRCS 2026). Soils across the entire Solar Siting Area are predominantly rated by NRCS as "organic matter depletion high" or "organic matter depletion moderately high," which indicates that the soil and site have features that are conducive to the depletion of organic matter and careful management will be needed to prevent organic matter loss when these soils are farmed (NRCS 2026). Low percentage of organic matter in soil indicates low capability for the soil to retain moisture during the dry periods of the year. This means that low-organic soils can limit the potential yield for dryland crop cultivation, which relies on the moisture retained in the soil from the fallow year of the every-other-year crop rotation.

Table D-1. Soil Classifications in Solar Siting Area

Soil Type ID/Soil Unit	Farmland Classification	Irrigated Soil Capability Class	Non-Irrigated Soil Capability Class	Total Acres of Irrigated Soil[1]	Total Acres of Non-Irrigated Soil
1B / Anderly silt loam, 1 to 7 percent slopes	Prime farmland if irrigated	(blank)	IIIe	0	55
1C / Anderly silt loam, 7 to 15 percent slopes	Farmland of statewide importance	(blank)	IIIe	0	83
31B / Walla Walla silt loam, 1 to 7 percent slopes	Prime farmland if irrigated	IIe	IIe	0	785
31C / Walla Walla silt loam, 7 to 15 percent slopes	Farmland of statewide importance	IIIe	IIIe	0	320
Total Acres Arable Soils (excluding high value/Class I & II soils)				**1,244**	
Total Acres Non-Arable Soils				**0**	

Note:
1. Based on place-of-use water rights

Per OAR 660-033-0130(38)(b), *"'arable soils' means soils that are suitable for cultivation as determined by the governing body or its designate based on substantial evidence in the record of a local land use application, but 'arable soils' does not include high-value farmland soils described at ORS 195.300(10) unless otherwise stated."* Per the U.S. Department of Agriculture Soil Conservation Service, NRCS Class I through IV soils are considered suitable for cultivation or arable soils while Class V and higher are considered non-arable soils (Helms 1992). Class I and II soils are considered high-value farmland soils per ORS 195.300(10) and the definition of arable soils per OAR 660-033-0130(38)(b) excludes high-value farmland soils. As a result, arable soils per OAR 660-033-0130(38)(a) in the Solar Siting Area would include a total of 458 acres, or 37 percent, when irrigated or not irrigated (see Table D-1).

See sections below for a discussion of lands within the Solar Siting Area that meet the definition of high-value farmlands per ORS 195.300(10) (see Section 3.3.2.2) and arable lands per OAR 660-033-0130(38)(a) (see Section 5.4.3).

3.3.2.1 Soil Productivity

The NRCS soils report identifies irrigated and non-irrigated average crop yields per acre by soil map unit. The average yields per acre assume a high level of management to obtain the indicated yields (i.e., application of fertilizer, control of weeds, erosion control, etc.). The average crop yields are based mainly on the experience and records of farmers, conservationists, and extension agents. Available yield data from nearby counties and results of field trials and demonstrations also are considered. The most predominant soil classification within the Solar Siting Area is Walla Walla silt loam, which comprises approximately 89 percent of the Solar Siting Area, while the second most predominant soil classification, Anderly silt loam, comprises approximately 11 percent of the Solar Siting Area. NRCS assigns an average of 45 to 55 bushels per acre of winter wheat for non-irrigated Walla Walla silt loam and an average of 30 to 40 bushels per acre of winter wheat for non-irrigated Anderly silt loam. Landowner survey responses (see summaries in Table D-2 below) reported a slightly higher average yield at 55 to 61 bushels per acre.

Table D-2. Overview of Landowner Farmland Characteristics

Landowner	Crop Practices	Crop Schedule	Direct Jobs Currently Supported by Operators	Spending on Labor, Supplies and Services for Agricultural Operations (estimated reductions)	Range of Crop Yields Over the Past 5 to 10 Years	Plans for Land Outside of Solar Ssiting Area During Facility Operation
GRAY, BRETT L & TRENA D (Tract 1)	Grays own 2,522 acres farmland in Sherman County. Grays farm 3,422 acres total: • 2,422 acres of cultivated land owned by Grays. • 1,000 acres contract farmed. Of 3,422 acres of land farmed: • 486 acres of owned land (Tract 1) leased to RFA 5. The acres outside the lease area will continue to be farmed. • None of the contract farmed-land is leased to RFA 5. Grays anticipate continuing to farm the contract farmland.	Dryland wheat crop every other year, August 2023-October 2024 chemfallow spraying. October 2024 fertilize and seed, April spray wheat for weeds, Harvest July/Aug.	Family operation (2 people), will continue to farm lands outside solar fence line, no jobs lost.	Costs are $253 per acre on average (6 year average) Vendors include Mid Columbia Producers in Wasco (seed), Morrow County Grain Growers in Wasco (fertilizer, agricultural chemicals) plus bio solids from Tualatin Valley, the McGregor Company in Wasco (agricultural chemicals), and Ed Staub & Sons in Moro (fuel).	Avg. 61 yield per acre over last 10 years	Continue farming activities on land not used by RFA 5
CAMPBELL, STEPHEN TRUST FARM & CABIN (Tract 2)	Cambell Trust owns 935 acres total of farmland in Sherman County – all leased to Simpson Ranch to farm. 102 acres of Cambell Trust lands leased to RFA 5 – see Tract 3 responses.	Dryland wheat crop Every other year crop rotation.	See Tract 3 responses.	See Tract 3 responses.	See Tract 3 responses.	Continue farming activities on land not used by RFA 5
SIMPSON, RICHARD & NANCY (Tract 3)	Simpson Ranch, owned by Grant Simpson (son of Richard and Nancy Simpson) farms a total of 3,870 acres of farmland (all dry land wheat) in Sherman County. • 620 acres owned and farmed by Simpson Ranch (all acreage outside RFA 5 lease areas) • 3,250 acres contract farmed by Simpson Ranch. 242 acres of contract farmland leased to RFA 5. The 319 acres farmed by Simpson Ranch and leased to RFA 5 include: • 217 acres owned by Richard and Nancy Simpson (Tract 3). • 102 acres owned by Stephen Campbell Trust (Tract 2). Simpson Ranch will lose a total of 319 acres of dryland wheat from production (approximately 8% of total cropland in ranch's operations).	Dryland wheat crop Every other year crop rotation.	Family operation, no additional employees, no jobs lost	Typical expenditures associated with dryland farming purchased from a variety of vendors both locally and elsewhere Actual costs not provided.	60 bushels per acre	Continue farming activities on land not used by RFA 5
MCCOY LAND (Tract 4)	McCoy Land owns 1,690 acres of farmland in Sherman County. 439 acres leased to RFA 5. All leased acres are currently farmed by crop share lessee.	Dryland soft white wheat and very occasionally spring barley Every other year crop rotation.	439 acres are crop share leased to a farmer not involved with RFA 5. The lessee has other farmland in county and the certificate holder's understanding is the lessee will continue to farm lands outside lease area and no loss of employment anticipated.	(No information provided – contract farmer handles the farm expenses)	55 bushels per acre per year average	Continue farming activities on land not used by RFA 5

3.3.2.2 High-Value Farmland

Certain lands within the exclusive farm use (EFU) zone[1] are considered high-value farmland if they meet the definitions under ORS 195.300(10). The applicable provisions of this statute are summarized below:

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

As discussed in Section 3.3.1, no land in the Solar Siting Area is within a place-of-use irrigation water right, irrigation district, or diking district. Therefore, no land in the Solar Siting Area meets the definition of high-value farmland under ORS 195.300(10)(c). Portions of the Solar Siting Area qualify as high-value farmland under the other two above cited definitions: ORS 195.300(10)(a) and (f). Each definition is considered below.

ORS 195.300(10)(a)

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

1. Identify NRCS irrigated soil capability class for “irrigated" portions of tract.
2. Identify NRCS non-irrigated soil capability class for non-irrigated portions of tract.
3. Sum all Class I, II, Prime, and Unique acres from steps 1 and 2.
4. Divide by total tract acres; if 50 percent or more are Class I, II, prime, and unique, then entire tract contains high-value farmland.

A predominance test per tract is provided in Table D-3 below. Based on the results of the predominance test, three of the four tracts in the Solar Siting Area have 50 percent or more Class I,

[1] Identified as the F-1 zone in Sherman County.

II, prime, and unique soils and meet the definition of high-value farmland under ORS 195.300(10)(a) and ORS 215.710.

Table D-3. High-Value Farmland Predominance Per Tract

Tract	Owner	Water Right	Total Tract Acreage	Acreage of High Value Soils (NRCS Soils Class I, II, Prime, or Unique)				Meets Definition of High-Value Farmland (Y/N)
				Irrigated Portions of Tract	Non-Irrigated Portions of Tract	Total	Percent of Tract Area	
1	GRAY, BRETT L & TRENA D	N/A	809	N/A	611	611	76%	Y
2	CAMPBELL, STEPHEN TRUST FARM & CABIN	N/A	102	N/A	96	96	94%	Y
3	SIMPSON, RICHARD & NANCY	N/A	259	N/A	146	146	56%	Y
4	MCCOY LAND	N/A	482	N/A	217	217	45%	N

ORS 195.300(10)(f)

The entire Solar Siting Area is located within the Columbia Valley AVA. Approximately 527 acres (42 percent) of the Solar Siting Area qualifies as high-value farmland based on being in the Columbia Valley AVA and meeting the elevation, slope, and aspect criteria under ORS 195.300(10)(f) (see Table D-4). The areas qualifying as high-value farmland under ORS 195.300(10)(f) are scattered throughout the Solar Siting Area (see Figure D-7) and have never been used for viticulture.

Total High-Value Farmland in Solar Siting Area

Per the predominance test (see Table D-3), three of the four tracts in the Solar Siting Area have 50 percent or more Class I, II, prime, and unique soils and meet the definition of high-value farmland under ORS 195.300(10)(a) and ORS 215.710. Portions of the Solar Siting Area also meet the definition of high-value farmland under ORS 195.300(10)(f) (i.e., location in the Columbia Valley AVA). As the lands that qualify as high-value farmland under ORS 195.300(10)(a) and (f) overlap in some areas within the Solar Siting Area (see Figure D-7), a composite of the lands was calculated for a net total of 999 acres of high-value farmland within the 1,244-acre Solar Siting Area. Table D-4 provides a breakdown by acreage of the applicable ORS 195.300(10) classifications.

Table D-4. High-Value Farmland in the Solar Siting Area

Land Type	Solar Siting Area	
	Acres	Percent of Solar Siting Area
High-value land Per ORS 195.300(10)(a) (i.e. Prime, Unique, Class I or II soils)	805	65%
High-value land Per ORS 195.300(10)(c) (i.e. within place of use water right or irrigation district)	0	0%
High-value land Per ORS 195.300(10)(f) (i.e. within AVA and meets slope, elevation, aspect criteria.	527	42%
High-value lands (merged all 3 HVFs)[1]	999	80%
Note: 1. Composite of the lands defined as high-value farmland designations per ORS 195.300(10)(a), (c), and (f).		

3.3.2.3 Arable Lands

Per OAR 660-033-0130(38)(a), "'arable land' means land in a tract that is predominantly cultivated or, if not currently cultivated, predominantly comprised of arable soils." As each tract in the Solar Siting Area is predominately cultivated with dryland wheat, the entire Solar Siting Area is considered arable land (see Figure D-8 and Table D-5).

Table D-5. Tract Analysis Predominance Test of Arable Land

Tract	Owner	Total Tract Acreage	Acreage of Arable Land				
			Cultivated Land	Acreage of Arable Soils[1]	Total Arable Land[2]	Percent of Tract Area	Meets Definition of Arable Land (Y/N)
1	GRAY, BRETT L & TRENA D	809	803	198	804	99%	Y
2	CAMPBELL, STEPHEN TRUST FARM & CABIN	102	102	6	102	100%	Y
3	SIMPSON, RICHARD & NANCY	259	257	114	258	99%	Y
4	MCCOY LAND	482	462	254	472	98%	Y
Subtotals		**1,652**	**1,624**	**571**	**1,636**	**-**	**-**
Notes: 1. As Class I and II soils are considered high-value farmland soils per ORS 195.300(10) and the definition of arable soils per OAR 660-033-0130(38)(b) excludes high-value farmland soils, the total acreage of arable soils includes only NRCS Class III and IV soils. 2. "Arable land" is based on a predominance of arable soils and cultivated land. Since arable soils and cultivated land may overlap, this column is a composite of both.							

3.3.2.4 Summary of High-Value Farmland and Arable Lands Analysis

The Solar Siting Area contains 999 acres of high-value farmland per ORS 195.300(10)(a) and (f). The entirety of the Solar Siting Area (1,244 acres) consists of arable lands. The Solar Siting Area will exceed the 12-acre threshold for impacts to high value farmland provided by OAR 660-033-0130(38)(g) and (h) and the 20-acre threshold for arable land provided by OAR 660-033-0130(38)(i). OAR 660-033-0130(38)(k) allows for an exception to the acreage and soil thresholds in OAR 660-033-0130(38)(g), (h), and (i) to be taken pursuant to ORS 197.732 and OAR Chapter 660, Division 4. The Certificate Holder, therefore, seeks a Goal 3 exception and provides evidence in Section 5.6 to demonstrate that a "Reasons" exception from Goal 3 is appropriate for the Solar Siting Area.

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

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

The Certificate Holder is seeking a Council determination under ORS 469.504(1)(b).

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

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

The Certificate Holder has prepared a map of the analysis area pursuant to OAR 345-022-0030(7)(b)(A) (Figure D-1). The analysis area is a 0.5-mile buffer from the RFA 5 Site Boundary. A map showing the comprehensive plan designations and land use zones in the analysis area is included as Figure D-2.

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

> *(B) If the applicant elects to obtain local land use approvals:*
>
> *(i) Identify the affected local governments from which land use approvals will be sought;*
>
> *(ii) Describe the land use approvals required in order to satisfy the Council's land use standard;*
>
> *(iii) Describe the status of the applicant's application for each land use approval; and*

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

The Certificate Holder is not seeking local land use approval and is instead seeking a Council determination under ORS 469.504(1)(b).

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

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

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

(i) Identify the affected local governments;

The proposed changes in RFA 5 will be located entirely within Sherman County. All land within the RFA 5 Site Boundary is in the F-1 Zone (see Figure D-2). Therefore, the Certificate Holder has addressed applicable Sherman County criteria. Sections 5.2 and 5.3 provide evidence of compliance with the applicable local substantive criteria for the Solar Components and gen-tie line in Sherman County.

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

The applicable substantive criteria of the SZCO and SCCP are addressed in Sections 5.2 and 5.3, respectively.

5.2 Compliance with Sherman County Zoning Ordinance

5.2.1 SCZO Section 3.1 Exclusive Farm Use (F-1) Zone

5.2.1.1 SCZO Section 3.1.2 Uses Permitted

In the F-l Zone, the following uses and their accessory uses are permitted:

(v) Utility Facility services lines as set forth in ORS215.283 (1) (x).

The gen-tie line required for interconnection to the POI is not included in the definition of "photovoltaic solar power generation facility" and is evaluated separately under a different use category[2], as directed by Oregon Revised Statutes and confirmed by EFSC. The SCZO has not been amended since July 2003 and, therefore, does not contain uses that have been added by the Oregon State Legislature during the interim and causes the SCZO references to use categories listed under

[2] This separate use category is either listed in the local jurisdiction zoning ordinance or falls within ORS 215.283(1)(c).

ORS 215.283(1) to be unreliable. As a result, the Certificate Holder looks to the current edition of ORS 215.283(1)[2025 Edition](Oregon Legislature 2025).

The gen-tie line does not fall within the administrative uses listed in SCZO 3.1.2. Further, as the gen-tie line does not generate power and is less than 200 feet in height, it does not fall within the conditional uses listed in SCZO 3.1.3 as it does not meet the SCZO use categories for a commercial utility facility (SCZO 3.1.3(q)) or a transmission tower over 200 feet in height (SCZO 3.1.3.(x)). Gen-tie lines typically fall within the use category of *utility facilities necessary for public service*, ORS 215.283(1)(c)[2025 Edition]. In summary, the gen-tie line does not fall within the current list of uses permitted provided by SCZO 3.1.2 or 3.1.3, despite the use being listed under ORS 215.283(1) as permitted subject to the required standards. OAR 660-033-0120 provides guidance on review requirements and applicable standards for *utility facilities necessary for public service*[3] and clarifies that, while specific standards must be met, those standards do not include OAR 660-033-0130(5) and are not subject to conditional use review. Therefore, the Certificate Holder proposes to directly apply ORS 215.283(1)(c) [statute text provided below].

ORS 215.283(1)(c)

Utility facilities necessary for public service, including wetland waste treatment systems but not including commercial facilities for the purpose of generating electrical power for public use by sale or transmission towers over 200 feet in height. A utility facility necessary for public service may be established as provided in:

> *(A) ORS 215.275; or*
>
> *(B) If the utility facility is an associated transmission line, as defined in ORS 215.274 and 469.300*.

As stated above, since the transmission support structures will not be over 200 feet in height, they fall within the ORS 215.283(1)(c) threshold. The gen-tie line may be established pursuant to ORS 215.283(1)(c)(B) because it falls within the definition of "associated transmission lines" pursuant to ORS 469.300 and 215.274. The standards of ORS 215.274 are addressed in Section 5.4.1 below.

Therefore, the gen-tie line falls within the "utility facility necessary for public service" use category provided by ORS 215.283(1)(c)(B).

5.2.1.2 SCZO Section 3.1.3 Conditional Uses Permitted

In an F-l Zone, the following uses and their accessory uses are permitted when authorized in accordance with the requirements of Article 5 of this Ordinance and this Section:

> *(q) Commercial Utility Facilities;*
>
> *(z) Construction, reconstruction, or widening of highways, roads, bridges or other transportation projects that are in the Sherman County Transportation system plan*.

[3] Regulated by both ORS 215.283(1)(c) and OAR 660-033-0130(16).

The Council previously permitted the BCWF as a "commercial utility facility" in Sherman County.[4] As stated above, the SCZO has not been amended since July 2003 and, therefore, does not contain uses that have been added by the Oregon State Legislature during the interim and causes the SCZO references to use categories listed under SCZO 3.1.3 to be incomplete. As provided by OAR 660-033-0130(38), the Solar Components[5] may be authorized in an EFU zone, such as the Sherman County F-1 zone, through a conditional use review. The Solar Components include solar arrays, inverters, BESS facilities and their subcomponents (i.e., inverters), a project substation, an O&M facility, internal roads, medium-voltage collector lines, and temporary laydown areas, perimeter fencing, facility entry gate, and site access roads. The criteria of OAR 660-033-0130(38) are addressed in Section 5.4.3 below. As previously discussed in Sections 5.2.1.1 and 5.4.1, the gen-tie line falls within a separate use category from the Solar Components and is regulated by ORS 215.274 as described Section 5.4.1.

If improvements to county roads are required for construction of the Solar Components, they would likely be in the form of road widening and/or improving the surface condition. To be conservative, it is assumed that the roads receiving improvements will be roads within the Sherman County Transportation System Plan; therefore, these improvements would fall within SCZO 3.1.3(z) "*…widening of…roads…in the Sherman County Transportation system plan"* use category.

See Section 5.2.5 for an analysis of the Solar Components' compliance with the SCZO Article 5 Conditional Uses.

5.2.1.3 SCZO Section 3.1.4 Dimensional Standards

In an F-1 (EFU) Zone, the following dimensional standards shall apply:

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

The Certificate Holder is not proposing to create new farm parcels as part of RFA 5. Therefore, this criterion is not applicable.

> *(b) MINIMUM LOT SIZE-NON-FARM PARCELS. Non-farm parcels allowed pursuant to the provisions of this Ordinance and more specifically this Section, shall meet the following standards:*
>
> > *1) Shall be of adequate size and dimensions to meet applicable setback requirements.*
> >
> > *2) Shall be of the minimum size necessary to accommodate the intended use and provide for subsurface sewage disposal thereof.*
> >
> > *3) Each such parcel shall contain a minimum of I Net Buildable Acre as defined in section 1.4 of this Ordinance.*

The Certificate Holder is not proposing to create new non-farm-parcels as part of RFA 5. Therefore, this criterion is not applicable.

[4] Final Order for Biglow Canyon Wind Farm Site, June 30, 2006, pg. 41.
[5] A *photovoltaic solar power generation facility* as defined by OAR 660-033-0130(38)(f).

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

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

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

In the Final Order on the BCWF Application for Site Certificate, the Council previously recommended a 50-foot setback from property lines for all aboveground facility structures.[6] In the Final Order on RFA 4, the Council required all aboveground components of the solar facility (including the perimeter fence) be set back at least 50 feet from all property lines with non-participating landowners and public roads. The Solar Components in RFA 5 (solar arrays, BESS, and associated facility components) will be set back at least 50 feet from all non-participating property lines and public road rights-of-way. The gen-tie line will be located within one or more utility easements. Therefore, RFA 5 will meet the required setbacks consistent with past Council Final Orders.

5.2.2 SCZO Section 3.6 Significant Resource Combining Zone, SR Zone

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

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

   . . .[criteria omitted as not applicable]

5. *Reduced Preservation Review Criteria - The environmental, social, economic and energy consequences of allowing the proposed use or activity shall be described in sufficient detail to provide a clear demonstration that the applicable criteria below are met: All Significant Resource Sites.*

[6] Final Order for Biglow Canyon Wind Farm Site, June 30, 2006, pg. 43.

1) The resource site shall not be altered or impacted to the point where it no longer has any significant resource value.

2) The amount of alteration of or impact to the significant resource shall be the minimum necessary to accomplish the purpose of the proposed use or activity.

3) An alternative site for the proposed use or activity, which would have less impact on the resource value of the site, does not exist on the applicant's lot or parcel or on contiguous lots or parcels that are reasonably available for the proposed use.

. . . (criteria omitted as not applicable)

(c) Mineral and Aggregate Resource Sites.

1) A conflicting use listed under Subsection (6) of this Section within 1,320 feet from a significant mineral or aggregate resource site (active or potential) may be required to establish setbacks in excess of those required in the underlying primary zone. The required setback shall be determined by the County after consultation with the applicant and the owner/operator of the mineral resource land (or vice versus) to insure visual and sound screening between present and future resource uses and the conflicting use or activity. Such setbacks shall be no less than that set forth by the primary zone.

6. Conflicting Uses and Activities

. . . (criteria omitted as not applicable)

(g) Mineral and Aggregate Resources.

1) Any permanent use, which reasonably precludes the development and use of such resource for the use designated or intended.

. . . (additional criteria omitted as not applicable)

There are no mineral or aggregate resources in proximity to the RFA 5 Site Boundary; therefore, these standards will not apply.

5.2.3 SCZO Section 3.7 Natural Hazards Combining Zone, NH Zone

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

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

There are no portions of the RFA 5 Site Boundary that overlap with the NH Combining Zone; therefore, these standards do not apply.

5.2.4 SZCO Article 4. Supplementary Provisions

5.2.4.1 SCZO Section 4.3 Off-Street Parking

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

. . .

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

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

The Solar Components are considered a utility, which is not a commercial or industrial use. The only proposed building is the O&M building. It will consist of one 60-foot by 12-foot steel building and/or prefabricated office structure with electricity, internet, and water facilities. The O&M building will have space for parking, service staging zone, and a clearance area. Using the more conservative commercial uses off-street parking requirement above, a minimum of two parking spaces would be needed for the 720-square-foot building. There will be a total of four full-time employees on-site during operation. At a minimum, parking spaces for four staff members will be provided at the O&M building.

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

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

As evidenced by the narratives and attachments supporting this RFA, the Certificate Holder has identified all applicable state and federal agency rules and regulations and provided evidence of compliance. Further, Section 5.4 of this exhibit identifies and addresses state agency rules specific to land use regulation. Section 6.0 of this exhibit addresses the applicability of federal land management plans to the Solar Components.

5.2.4.3 SCZO Section 4.13 Additional Conditions to Development Proposals

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

1. *The proposed use shall not reduce the level of service (LOS) below a D rating for the public transportation system. For developments that are likely to generate more than a V/C ratio of 75 or greater, the applicant shall provide adequate information, such as a traffic impact study or traffic counts, to demonstrate the level of impact to the surrounding road system. The developer shall be required to mitigate impacts attributable to the project.*

2. *The determination of the scope, area, and content of the traffic impact study shall be coordinated with the provider of the affected transportation facility, i.e. city, county, or state.*
3. *Dedication of land for roads, transit facilities, sidewalks, bikeways, paths, or accessways shall be required where necessary to mitigate the impacts to the existing transportation system caused by the proposed use.*
4. *Construction of improvements such as paving, curbing, installation or contribution to traffic signals, construction of sidewalks, bikeways, accessways, paths, or roads that serve the proposed use where necessary to mitigate the impacts to the existing transportation system caused by the proposed use.*

Traffic impacts will be greatest during the peak of construction. The Certificate Holder expects an average of 200 workers on-site during the 18-month construction period, with a peak number of 550 workers while multiple disciplines of contractors complete their work simultaneously during periods of the highest activity (approximately 4 to 6 months during construction). With an anticipated capacity of 2,800 passenger cars per hour, this would give a Volume to Capacity ratio (V/C Ratio) of 0.26 along U.S. Highway (US) 97. Considering the availability of Passing Zones, the terrain, and the design speed of 60 miles per hour, this equates to a Level of Service (LOS) of B. With approximately 58 vehicles during the peak AM and PM hour under existing conditions along Oregon State Route (OR)-206, the addition of 550 commuting workers during peak construction results in a V/C Ratio of 0.22. This equates to an LOS of B, which means minimal delays will be generated by the increase in traffic. The traffic resulting from construction personnel will not generate more than a V/C Ratio of 0.75 or greater on the surrounding road system therefore a traffic impact study is not anticipated to be required. A Construction Traffic Management Plan will be developed prior to construction, in accordance with Site Certificate Condition PRE-PS-02, that will include traffic minimization measures at transportation route roads, which would be implemented as needed, staggering shift start times to reduce vehicle trips through the westbound Interstate (I)-84 ramp terminal at Biggs Junction, installation of temporary traffic controls during peak construction, and other mitigation measures, as applicable. Also, the Certificate Holder will ensure that any wear or damage to county roads as a result of the proposed Solar Facility is repaired and that roads are restored to pre-construction condition or better. Construction traffic is discussed further in Exhibit L.

Traffic will be significantly less during operation than during construction. The Certificate Holder expects that the Solar Facility as amended by RFA 5 will require up to four personnel for daily maintenance activities during operations over its 40-year lifespan. The O&M staff will be hired locally, to the extent that skilled workers are available. Some outside contractors may be required from time to time for specialized maintenance tasks, such as solar array inspections or the repair of associated equipment. The traffic resulting from operation personnel will not generate more than a V/C Ratio of 0.75 or greater on the surrounding road system.

5.2.4.4 SCZO Section 4.14 Access Management

1. *General - The intent of this section is to manage access to land development to preserve the transportation system in terms of safety, capacity, and function. This ordinance shall apply to*

all arterials and collectors within Sherman County and to all properties that abut these roadways. This ordinance is adopted to implement the access management policies of Sherman County as set forth in the Transportation System Plan.

The Certificate Holder is coordinating with the Sherman County Road Department and, prior to construction, will have an agreed-upon Road Use Agreement, which will ensure compliance with the SCZO, and as appropriate, the Sherman County Transportation System Plan (TSP). The proposed Solar Components are not a residential or commercial use, and as such criteria in Section 4.14 of the SCZO specific to residential or commercial uses are not applicable to the Solar Components and have been excluded below.

2. *2. Corner Clearance*

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

CORNER SPACING

Functional Classification	Access Category	Urban/Rural	Intersection				Signal Spacing	Median Control
			Public Road		Private Drive			
			Type	Spacing	Type	Spacing		
Arterial[11]	Urban/ Other	U	At grade	770 ft			NA	NA
Collector	NA	R	At grade	1/4 mi.	Lt./Rt. Turns	1,200 ft.	NA	NA
Local Street	NA	R	At grade	200-400 ft	Lt./Rt. Turns	Vary	NA	NA

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

1) Either a land use action is proposed,

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

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

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

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

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

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

The Certificate Holder is not proposing the dedication of new public right of way or the construction of new public roads. Background Exhibit Figure 2 shows new private access driveway connections to Medler Lane, a local public road. The proposed new private access driveway connections will be coordinated with the Sherman County Road Department and meet or exceed the minimum spacing required by the SCZO and TSP.

4. *Access Connection and Driveway Design*

   (a)Driveways shall meet the following standards:

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

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

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

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

The Certificate Holder proposes two new private access roads connecting the RFA Solar Facility internal access roads and the project substation to Medler Lane as shown on Background Exhibit Figure 2. The driveways will provide for two-way access and shall have a minimum width of 16 feet and a maximum width of 24 feet. Prior to construction, the Certificate Holder will coordinate with the Sherman County Road Department to obtain any necessary permits for placement and construction of private access driveways and shall design the intersections and driveways in a manner consistent with the requirements of the SCZO and TSP.

5.2.4.5 SCZO Section 4.15 Pedestrian and Bicycle Access and Facilities

1. *General*
   The purpose of this section is to provide for safe and convenient pedestrian, bicycle and vehicular circulation consistent with access management standards and the function of affected streets.
2. *On-site facilities should be provided, where appropriate, to accommodate safe and convenient pedestrian and bicycle access.*

[subsections (a) through (c) have been omitted as not applicable to utility developments]

The proposed Solar Components fall within a utility use category. The Solar Components are fenced and not open to the public. They are also located in a rural location with low traffic volumes. The above criteria do not require pedestrian or bicycle access or circulation for utility developments. Staff operating the Solar Components will use the proposed and existing internal driveways to maneuver within the fenced RFA 5 Site Boundary. Off-street vehicle parking is proposed within the enclosure associated with the O&M building.

5.2.5 SCZO Article 5. Conditional Uses

The criteria of Article 5 are applicable to the Solar Components, which meet the definition of a PV solar power generation facility per OAR 660-033-0130(38)(f) and do not include the gen-tie line. The RFA 5 Solar Components will be contained entirely within the RFA 5 Solar Siting Area and greater RFA 5 Site Boundary.

5.2.5.1 SCZO Section 5.2 General Criteria

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

The applicable SCCP goals and policies are addressed in Section 5.3. As discussed in Section 5.3, the Solar Components are compatible with the SCCP.

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

As previously mentioned, the Solar Components are located entirely within the Sherman County F-1 zone. The Certificate Holder has addressed applicable criteria in Sections 5.2 above. As discussed above, the proposed additions comply with these zones. Therefore, this criterion is satisfied.

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

The Background Exhibit lists all applicable federal, state, and local permits that the Certificate Holder will obtain prior to construction of Solar Components.

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

The Solar Components may be authorized through a conditional use permit review in the F-1 zone pursuant to SCZO 3.1.3(q) and (z) and OAR 660-033-0130(38). Conditional use standards pursuant to SCZO 5.8 are addressed in Section 5.2.5.3 below.

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

As discussed in Exhibit L, the proposed changes in RFA 5 will not cause a significant burden on resource or public facility carrying capacities. The RFA 5 Solar Facility is not expected to have any significant adverse impact on any public or private service providers in the analysis area during construction or operation. Noise compliance regulations were evaluated in Exhibit O-3 and determined that noise emanating from the Solar Siting Area during operation will comply with state standards (i.e., OAR 340-035-0035). Construction activities are temporary and categorically exempted under OAR 340-35-0035(5)(g). The Council previously found that the BCWF was not likely to result in significant adverse impacts to public services,[7] and the amendments in RFA 5 do not alter that conclusion.

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

The Solar Components are permitted conditionally in the F-1 zone. Additionally, the gen-tie line is a permitted use in the F-1 zone. Therefore, the changes proposed in RFA 5 will comply with all applicable SCZO criteria and SCCP policies and will not violate the SCZO.

5.2.5.2 SCZO Section 5.3 General Conditions

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

1. *Limiting the manner in which the use is conducted, including restricting the time an activity may take place, and restrictions to minimize environmental impacts such as noise, vibration, air or water pollution, glare and odor.*
2. *Establishing a special setback or other open space requirements, and increasing the required lot size or other dimensional standards.*
3. *Limiting the height, size or location of a building or other structure or use.*
4. *Increasing street width and/or requiring improvements to public streets and other public facilities serving the proposed use, even including those off-site but necessary to serve the subject proposal.*
5. *Designating the size, number, improvements, location and nature of vehicle access points and routes, and requiring pedestrian and/or bicycle ways.*

[7] Final Order on Request for Amendment 4, p. 224 (March 2026).

6. *Limiting or otherwise designating the number, size, location, height, and lighting of signs and outdoor or security lighting, and the intensity and/or direction thereof.*
7. *Requiring diking, screening, fencing, or other improvements or facilities deemed necessary to protect adjacent or nearby properties, and establishing requirements or standards for the installation and maintenance thereof.*
8. *Protecting and/or preserving existing trees, other vegetation, and water, scenic, historic, archaeological, unique, landmark, or other natural or manmade significant resources.*

The Certificate Holder understands additional conditions may be imposed upon the Solar Components by the Council, including conditions recommended by the County in its role as the Special Advisory Group.

5.2.5.3 SCZO Section 5.8 Standards Governing Specific Conditional Uses

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

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

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

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

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

The Solar Components are not located in a residential zone or area and will be entirely fenced with security gates at vehicle entry points. The exterior of the Solar Components structures, specifically the collector substation, will be of a neutral color or as otherwise required by the Council.

14. *Public Facilities and Services*

    (a) Public facilities including, but not limited to, utility substations, sewage treatment plants, storm water and water lines, water storage tanks, radio and television transmitters, electrical generation and transmission devices, fire stations and other public facilities shall be located so as to best serve the County or area with a minimum impact on neighborhoods, and with consideration for natural or aesthetic values.

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

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

The Council previously concluded that SCZO Section 5.8.14 applies to the BCWF substation, wind turbines, and transmission lines[8], as well as to the RFA 4 Solar Components. Similarly, the Certificate Holder anticipates that the RFA 5 Solar Components would be considered public facilities and services subject to SCZO Section 5.8.14.

The Solar Components are sited in an area that would have minimal impacts on neighborhoods both from a natural and aesthetic value consideration. The remote location of the Solar Components and location in context of existing electrical infrastructure render visual impacts as negligible to scenic and aesthetic values evaluated in Exhibit L. Glare impacts were evaluated in Exhibits I and L and are considered insignificant. The new collector lines proposed within the Solar Siting Area will be placed at least 3 feet below grade and will not be obtrusive.

As discussed in Exhibit O-3, there will be no impacts to wetlands during the construction or operation of the Solar Components. Wetlands within the Solar Siting Area will have at least 50-foot buffers from construction activities and facility components, such as the gen-tie line.

20. *Non-farm Uses in an F-1 Zone - Non-farm uses, excluding farm related, farm accessory uses, or uses conducted in conjunction with a farm use as a secondary use thereof, may be approved upon a finding that each such use:*
    a. *Is compatible with farm uses described in ORD 215.203(2);*

The Solar Components are a non-farm use in the F-1 zone. "Farm use" for purposes of SCZO 5.8(20)(1) is the employment of land for raising, harvesting and selling crops for profit, primarily dryland wheat with some spring barley production (see landowner surveys in Attachment D-1).

Typical compatibility issues for this type of farm use include disturbance of planting, farm management (spraying chemicals and fertilizer, livestock grazing rotations, etc.), and harvest schedules during facility construction. Increased traffic from construction of the Solar Components may cause the most impact on day-to-day wheat farming operations. To ensure that construction activities are compatible with day-to-day farm operations, a Construction Traffic Management Plan will be developed prior to construction, in accordance with Site Certificate Condition PRE-PS-02, that will include traffic minimization measures at transportation route roads, which would be implemented as needed, staggering shift start times to reduce vehicle trips through the westbound I-84 ramp terminal at Biggs Junction, installation of temporary traffic controls during peak construction, and other mitigation measures, as applicable. Also, the Certificate Holder will ensure that any wear or damage to county roads as a result of the proposed Solar Components is repaired and that roads are restored to pre-construction condition or better. Construction traffic is discussed further in Exhibit L.

Once constructed, the Solar Components are not anticipated to result in compatibility issues for ongoing wheat cultivation. The solar arrays are generally oriented adjacent and parallel to existing roads (see Background Exhibit Figure 2), and have been sited to maximize efficiency while also consolidating the solar arrays to areas that do not constrain the current and future dryland wheat

[8] Final Order for Biglow Canyon Wind Farm June 30, 2006, pg. 49

farming activities on the remainder of the tracts or on neighboring tracts. The Certificate Holder will design and construct the Solar Components using the minimum land area necessary for safe construction and operation. The Solar Components will utilize existing access roads to the extent practicable.

For these reasons, the Council may find that the Solar Components will be compatible with wheat farming operations and meet SCZO 5.8.20.1.

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

The criterion above is included in the criteria of OAR 660-033-0130(5), which are addressed below in Section 5.4.2.

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

For purposes of this criterion, Certificate Holder defines the "area" as the portion of Sherman County east of US-97 and north of Grass Valley Canyon. The existing land use pattern of the area can be characterized as dryland crop cultivation (wheat and barley), rangeland and renewable energy facilities, both wind and solar (Figure D-3, Google Earth 2026, and landowner surveys in Attachment D-1). Beyond the 0.5-mile analysis area shown on Figure D-1, and except for incorporated towns and rural nodes, the topography similarly consists of rolling hills and drainages with dryland wheat farming as the main land use. As discussed above, Sherman County is predominantly composed of farmland, the majority of which is in use for crop production. Only approximately 1,045 acres of land in Sherman County was irrigated, indicating the heavy reliance on dryland crop production (USDA 2022). Using the Solar Siting Area of 1,244 acres, the Certificate Holder finds that the Solar Components would remove less than one percent of Sherman County cropland from cultivation during the life of the Facility (USDA 2022).

As shown on Background Exhibit Figure 2, no small or isolated pieces of property will be created as a result of the proposed Solar Siting Area. Solar arrays and facility components fill in the areas of the Solar Siting Area not used by the BCWF wind turbines or occupied by wetlands, protected habitats, or steep slopes. Therefore, the land use pattern will continue to include farmland as well as renewable energy components and will not materially change.

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

The Certificate Holder cannot demonstrate compliance with this criterion because of the underlying site characteristics, including soil classification and existing and historic farming operations. The Certificate Holder seeks a Goal 3 exception to nonetheless allow the Solar Components as "Reasons" warrant the exception and approval of the Solar Components as discussed in Section 5.6.

e. Complies with other applicable significant resource provisions; and

There are no known other significant resource provisions applicable to the Solar Components that have not been previously addressed.

f. Complies with such other conditions as deemed necessary.

RFA 5 will comply with all conditions of approval imposed by the Council in granting the site certificate.

5.3 Compliance with Sherman County Comprehensive Plan Goals

5.3.1 Planning Process and Citizen Involvement (Comprehensive Plan § VIII): Outreach

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

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

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

The Certificate Holder is seeking a Council determination of compliance with land use standards and the Council's procedures rather than the County's specific procedures. Relevant Sherman County development criteria, comprehensive plan policies, OARs, and ORSs are addressed in this narrative. Citizen involvement is a key element of the amendment process. Community members and public agencies will be notified of the amendment request and given the opportunity to comment on the proposed changes.

5.3.2 Physical Characteristics (Comprehensive Plan § XI)

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

Policy I. Erosion control provisions shall be incorporated into the subdivision requirements of the Development Code. These shall require that the best practical methods be used to control erosion from road and building construction sites as well as other changes in land use, which may degrade the quality of the land, air and water.

The Certificate Holder will obtain a National Pollutant Discharge Elimination System (NPDES) 1200-C permit from the Oregon Department of Environmental Quality prior to construction of the Solar Components. As required by the NPDES Construction Stormwater Discharge General permit 1200-C, an Erosion and Sediment Control Plan (ESCP) must be submitted that includes best management practices (BMPs; see Exhibit C, Attachment C-1 for the draft ESCP). The proposed

BMPs are included in Exhibit C. Overall, the Certificate Holder does not anticipate the Solar Components having major effects from erosion.

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

Potential natural hazards within the land use analysis area include earthquakes, landslides, volcanic activity, flooding, and wildfire. These hazards are identified and addressed in Exhibits B and M. The SCCP states that "natural hazards are primarily limited to those areas with cross-slopes greater than 40% and along waterways" and provides protection for those areas through the designation of the NH Zone and by participating in the National Flood Insurance Program. As described in Section 5.2.2 above, through the final design process as informed by a site-specific geotechnical report and Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map panels, the Solar Components will be located outside of natural hazard areas.

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

As shown on Figure B-3 (Exhibit B), the Solar Components are not located on lands designated as flood prone as provided by Flood Insurance Rate Map Panels 41055C 0070C and 41055C 0200C both effective on July 22, 2025 (FEMA 2026).

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

The SCCP does not provide a description or definition of "rural nature." The opposite of rural land in Oregon is all land located within an urban growth boundary or within city limits. The Certificate Holder understands rural landscapes to generally be considered low population density areas with homes on parcels 2 acres or larger and development typically related to agricultural, industrial or resource businesses. The Solar Components do not include the construction of any homes within the Solar Siting Area and would not result in the establishment of urban infrastructure such as a community or public water or sewer system. The majority of the solar and BESS components are low-lying (under 20 feet tall) with taller structures being transmission line or utility poles. As discussed above in Section 3.3, the Solar Components will not interfere seriously with accepted farming practices on adjacent lands devoted to farm use nor will it materially alter the overall land use pattern of the area.

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

As discussed in Exhibit G, due to the multi-year construction schedule of the Solar Components, both permanent and temporary impacts to fish and wildlife habitat will occur in phases over this time period. Permanent impact areas are those that would be converted from the existing condition to a different condition for the life of the Solar Components. Temporary impact areas are those areas that would be disturbed during construction activities but would not become permanent parts of the Solar Components. Direct impacts to habitat include permanent loss and temporary disturbance of some specific habitat types; indirect impacts may include increased potential for the invasion of noxious weeds, particularly along fence lines and roads. Before each phase of construction, some areas within the construction footprint will be cleared of vegetation, with permanent and temporary impacts to habitats within the Solar Siting Area. As shown in Table D-6 below, no Category 1 habitat is located within the Solar Siting Area. The bulk of the habitat within the Solar Siting Area, and the majority of Solar Components impacts will be to Category 6 habitat, which accounts for 99.5 percent of the habitat to be impacted temporarily during construction and 100 percent of the habitat to be impacted permanently. In this manner, fish and wildlife habitat have been preserved through the siting of the Solar Siting Area.

Table D-6. Acres of Temporary and Permanent Disturbance by Habitat Category

Habitat Category	Habitat Type	Habitat Subtype	Impacts (acres)	
			Permanent	Temporary
3	Upland	Upland Trees	5.0	
		Category 3 Total	**5.0**	**0.0**
4	Grassland-steppe	Grasslands	0.9	
		Category 4 total	**0.9**	**0.0**
6	Agriculture	Non-Irrigated Cropland	1237.1	43.9
	Developed		1.1	0.2
		Category 6 Total	**1,238.2**	**44.1**
		Grand Total	**1,244.1**	**44.1**

One issue of potential concern can be the increased need for herbicides to control weeds in crop fields due to construction activity. Construction equipment is a source of the dispersal of weed seed that may not otherwise be found in the area, and disturbed ground offers an opportunity for weeds to establish themselves. The Certificate Holder shall control the introduction and spread of noxious weeds in accordance with the methods, monitoring procedures and success criteria set forth in the Comprehensive Solar Revegetation and Soil Management Plan, which is Attachment C-2 to Exhibit C. The plan will be finalized in consultation with the Sherman County Weed Department and will likely include BMPs to prevent the spread of existing noxious weeds and ensure that new populations of species are not accidentally introduced. These BMPs include flagging and treating areas of noxious weed infestations prior to construction, cleaning vehicles and equipment prior to ground disturbance, strategic use of herbicide, mechanical removal and revegetation of disturbed soils. Additional steps may include monitoring areas of disturbance for noxious weeds after

construction, training construction and operations staff and limiting vehicle traffic in noxious weed-infested areas.

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

As described in Exhibit G, the Solar Siting Area includes a very limited amount of wildlife habitat above Category 6. Of the approximately 1,244 acres of permanent impact area within the Solar Siting Area, only 5.9 acres, or less than 1 percent, consist of Oregon Department of Fish and Wildlife designated wildlife habitat types. The remaining 1,238 acres are considered developed or agriculture (Category 6 habitats). After construction of the Solar Facility as proposed under RFA 5 , the Certificate Holder will revegetate non-agricultural portions of the site using an approved seed mix comprising several species of native grasses and forbs (see the draft Comprehensive Solar Revegetation and Soil Management Plan in Exhibit C, Attachment C-2). Revegetation of cultivated agricultural areas will be coordinated with the appropriate landowner and/or farmer. Further, through weed management strategies during both construction and operation, noxious weeds will be prevented from negatively impacting habitats within or adjacent to the Solar Siting Area (see the draft Comprehensive Solar Revegetation and Soil Management Plan in Exhibit C, Attachment C-2).

A wetland delineation was performed for all land within the RFA 5 Site Boundary (see Exhibit O1). This assessment determined there will be no permanent impacts to waters of the State during the construction or operation of the Solar Facility as proposed under RFA 5.

5.3.3 Social Characteristics (Comprehensive Plan § XII)

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

Policy I. To improve or maintain the current level of social services available with the County and to assure the provision of public facilities consistent with the intensity of land use. The County Court shall encourage the location of industries, businesses and commercial services to diversify activities within the County consistent with the desired population growth and other goals and policies.

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

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

These policies are directives to Sherman County. However, the RFA 5 Solar Facility is not anticipated to cause a significant demand on public services within Sherman County (Exhibit L). As

described above and in Exhibit L, there are adequate public services and providers available within Sherman County to accommodate the influx of employees during construction of the RFA 5 Solar Facility. Existing public roads that will be utilized during construction of RFA 5 and will be improved to their original condition after construction if damage occurs. As mentioned in Exhibit L, construction and operation of the RFA 5 Solar Facility will not create significant delays or amounts of traffic on local roads. Due to the minimal number of permanent employees during operation (up to seven), the Certificate Holder anticipates traffic returning to its original condition after construction is complete.

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

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

The Sherman County Courthouse and the old Union Pacific Railroad bed through DeMoss Park are not located within the Solar Siting Area. A cultural resource survey and report of RFA 5 has been completed and is discussed in detail in Exhibit J. Any archaeological sites that are found within the Solar Siting Area and recommended for National Register of Historic Places (NRHP) listing or a deemed NRHP-eligible cultural resources will be directly avoided by the Solar Components. If avoidance is not practicable in the final design, any significant resources (i.e., NRHP-eligible or unevaluated resources) will be mitigated to reduce impacts to a status of less than significant.

5.3.4 Economics (Comprehensive Plan § XIV)

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

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

The RFA 5 Solar Facility continues to diversify the local economic base through the addition of construction, maintenance and renewable energy industry-specific jobs without undermining the viability of the agricultural sector as demonstrated by the agricultural and fiscal impacts analysis and the agricultural mitigation strategy discussed in Section 5.6 below.

5.3.5 Energy (Comprehensive Plan § XV)

5.3.5.1 Goal I. Conserve energy resources.

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

As discussed, the RFA 5 Solar Facility is a renewable energy facility. The energy produced by the Solar Components will be transported to the regional electric grid via an existing POI at the Biglow Canyon Substation, whereupon the energy will be distributed to the public. The RFA 5 Solar Facility supports this goal and policy because it is a renewable energy facility that will supply renewable resources to the grid and be made available for public use.

5.3.6 Land Use (Comprehensive Plan § XVI)

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

As provided by SCZO 3.1.3, *Commercial Utility Facilities* may be authorized as a conditional use. Additionally, OAR 660-033-0130(38) expressly lists *Photovoltaic solar power generation facility* as a use that may be allowed in EFU designated land as a conditional use. The RFA 5 Solar Facility is locationally dependent on proximity to transmission facilities and the existing Biglow Canyon Substation and the existing RFA 4 Solar Siting Area and co-located with BCWF and compatible with adjacent agricultural activities. All these factors contribute to the RFA 5 Solar Facility being compatible with this goal.

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

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

5.4.1 ORS 215.274

> *(1) As used in this section, "associated transmission line" has the meaning given that term in ORS 469.300.*
>
> > *ORS 469.300(3) "Associated transmission lines" means new transmission lines constructed to connect an energy facility to the first point of junction of such transmission line or lines with either a power distribution system or an interconnected primary transmission system or both or to the Northwest Power Grid.*

RFA 5 includes 2.7 miles of a gen-tie line that will connect the Solar Components to the existing Biglow Canyon Substation POI. As a result, the gen-tie line meets the definition of "associated transmission lines" provided by ORS 469.300.

> *(2) An associated transmission line is necessary for public service if an applicant for approval under ORS 215.213 (1)(c)(B) or 215.283 (1)(c)(B) demonstrates to the governing body of a county or its designee that the associated transmission line meets:*
>
> > *(a) At least one of the requirements listed in subsection (3) of this section; or*
> >
> > *(b) The requirements described in subsection (4) of this section.*

The gen-tie line meets the requirements referenced in ORS 215.274(2)(b). See below for responses to the criteria of ORS 215.274(4).

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

The gen-tie line is required to connect the collector substation to the Biglow Canyon Substation. The gen-tie line allows for distribution of the power generated by the Solar Components to the regional grid via the Biglow Canyon Substation. It is more efficient to consolidate the transmission of power into one higher voltage transmission line than to site, construct, and maintain a series of lower voltage transmission lines over the same route. Without the gen-tie line, numerous long parallel stretches of 34.5-kV collector lines would be required to transfer the energy from the solar arrays in each solar area to the Biglow Canyon Substation. These 34.5-kV collector lines would cause as much or more disturbance to the land as the gen-tie line proposed in RFA 5. Therefore, this factor is met.

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

The Certificate Holder evaluated the feasibility of alternative transmission routes to minimize potential impacts to arable land and high-value farmland. The existing Biglow Canyon Substation is in a fixed location and all tracts directly adjacent and surrounding the substation consist of arable land. Additionally, as shown on Figure D-7, this surrounding land contains high-value soils as defined by ORS 195.300(10)(f). The irregular placement and dispersed pattern of these high-value soils prevents the RFA 5 Site Boundary from connecting to the POI without crossing high-value soils.

The 2.7-mile gen-tie line connects the Solar Components to the existing POI. The gen-tie line is routed to follow along the Oehman Road right-of-way until it turns east at the intersection of McNab Lane and Oehman Road where it is sited along an existing dividing line between farm fields. The gen-tie line was sited so that it could have a reasonably direct route to the POI while minimizing impacts to farmland and represents the shortest length between the Solar Components and the POI that parallels exiting roads or transmission lines. There is no alternative transmission route that can avoid EFU and high-value farmland and further minimize impacts to farm fields and transmit energy from the Solar Components to the existing POI. Therefore, it meets the locationally dependent criterion.

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

There is no existing available right-of-way directly connecting the Solar Siting Area to the POI. Where available, the gen-tie line follows along existing Oehman Road right-of-way and runs parallel to an existing transmission line. Where the line does not follow a right-of-way or an existing transmission line corridor, it follows an existing dividing line between farm fields.

(D) Public health and safety; or

The Certificate Holder is minimizing health and safety risks from exposure to magnetic fields or shock by limiting the length of the transmission line for the Solar Facility as proposed under RFA 5 and locating the transmission line away from populated areas, specifically rural residences in the area. However, the rationale for route selection was not based on health and safety risks and does not meet this criterion.

(E) Other requirements of state or federal agencies.

As documented through the site certificate process, the Solar Components comply with other requirements of state and federal agencies. However, the siting of the associated transmission line was not determined by state or federal agencies, and as such the associated transmission line route selection does not meet this criterion.

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

The Certificate Holder has located the gen-tie line in a manner that minimizes, to the greatest extent practicable, impacts on surrounding lands devoted to farm use. The gen-tie line follows along either the right-of-way of Oehman Road or an existing transmission line right-of-way, except for an approximately 0.5-mile section where it crosses an existing break between two farm fields. This route minimizes impacts to existing farm fields by siting the gen-tie line along existing edges of farm fields. As shown by Figure D-1, active crop production occurs around the existing wind turbines and transmission lines located within the analysis area. The footprint of the transmission line poles is small, and each pole is a static object that allows for the continuation of farm use once installed.

During construction there may be some disturbance to the land. However, when construction is completed, lands temporarily affected by construction will be restored to their original condition. As discussed in Section 5.3.1, the Certificate Holder will coordinate with the landowners to minimize disturbances to agricultural production through the establishment of a construction traffic management plan. More discussion of how the Certificate Holder will minimize impacts to surrounding farmland uses from construction traffic, spread of noxious weeds, construction dust, wildfire risk, or limitations for farmland access is provided in Section 5.3.2.

Because permanent impacts of the gen-tie line are minimal, and the line has been sited in consideration of farming practices, it will not force a significant change in accepted farm practices nor a significant increase in the cost of farm practices on the surrounding farmland.

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

Costs were not the only consideration in determining whether the gen-tie line is necessary for public service. As discussed above, the location of the gen-tie line is based on technical rationale, feasibility, and locational dependency. The entirety of the land within the analysis area is within the EFU zone and in farm use. No alternative location exists, regardless of costs, to locate the gen-tie line on non-EFU land.

5.4.2 OAR 660-033-0130(5)

Minimum Standards Applicable to the Schedule of Permitted and Conditional Uses

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

> *(a) Will not force a significant change in accepted farm or forest practices on surrounding lands devoted to farm or forest use; and*
>
> *(b) Will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use.*
>
> *(c) For purposes of subsection (a) and (b), a determination of forcing a significant change in accepted farm or forest practices on surrounding lands devoted to farm and forest use or a determination of whether the use will significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use requires:*
>
> > *(A) Identification and description of the surrounding lands, the farm and forest operations on those lands, and the accepted farm practices on each farm operation and the accepted forest practices on each forest operation;*
> >
> > *(B) An assessment of the individual impacts to each farm and forest practice, and whether the proposed use is likely to have an important influence or effect on any of those practices; and*
> >
> > *(C) An assessment of whether all identified impacts of the proposed use when considered together could have a significant impact to any farm or forest operation in the surrounding area in a manner that is likely to have an important influence or effect on that operation.*
> >
> > *(D) For purposes of this subsection, examples of potential impacts for consideration may include but are not limited to traffic, water availability and delivery, introduction*

of weeds or pests, damage to crops or livestock, litter, trespass, reduction in crop yields, or flooding.

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

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

The standards of OAR 660-033-0130(5) are applicable to the Solar Components as provided by OAR 660-033-0120.

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

For purposes of evaluating OAR 660-033-0130(5), the "surrounding lands devoted to farm or forest use" are defined as land between the Solar Siting Area and 0.5 mile from the Solar Siting Area (see OAR 345-001-0010(59)(c) for the definition of the land use study area evaluated under EFSC and see "Analysis Area" on Figure D-9). As shown in Figure D-9, no forest operations exist within the surrounding lands; therefore, compliance with OAR 660-033-0130(5) includes an evaluation of farm use and farming practices. "Accepted farming practices" is defined by ORS 215.203(2)(c) as "a mode of operation that is common to farms of a similar nature, necessary for the operation of such farms to obtain a profit in money, and customarily utilized in conjunction with farm use." The accepted farming practice on the lands adjacent to the Solar Siting Area is primarily cultivation of dryland wheat, which includes fallowing half of the wheat fields each year, thus allowing the soil to collect 2 years of moisture to produce one crop. A list of landowners within surrounding lands and a description of the accepted farming practices occurring on these lands (as well as other existing land uses) is provided in Table D-7 below.

Table D-7. Farm Practices within Surrounding Lands

Landowner	Map and Tax Lot	Surrounding Lands Acreage	Also has Land Leased to RFA 5 (Yes/No)	Farm Practices and Other Land Uses within Surrounding Lands
McMillin Farms LLC & McMillin, Stephens S.	02N18E00007700, 02N18E00007800	289	No	Dryland wheat farming and BCWF turbines and access road.
McCoy Land	01N17E0000200	44	Yes	Dryland wheat farming.
Hilderbrand Family LTD Part	01N18E00001601, 01N17E0000101	56	Yes	Dryland wheat farming, homesite and farm structures.

Landowner	Map and Tax Lot	Surrounding Lands Acreage	Also has Land Leased to RFA 5 (Yes/No)	Farm Practices and Other Land Uses within Surrounding Lands
Hilderbrand, John O & Wanda	02N18E00007900, 01N18E00001600, 01N17E0000100	552	No	Dryland wheat farming, BCWF turbines and access road, and homesite.
Weedman Ranches	01N17E00003500	122	No	Dryland wheat farming, no structures.
Rice Keith, Christine Trust	01N17E00003300	359	No	Dryland wheat farming, no structures.
McClennan, Lyndon	01N17E0000300, 02N17E00008000	528	No	Dryland wheat farming, homesite and farm structures.
Gray, Brett & Trena	02N17E00005100 02N18E00007600 02N17E00008100 02N17E00008300	492	Yes	Dryland wheat farming and BCWF turbines and access road.
Simpson, Richard & Nancy	02N17E00008200	42	Yes	Dryland wheat farming, no structures.
Moffett, Lois C. Trustee	02N17E00005600	122	No	Dryland wheat farming and BCWF turbines and access road.
Fields, John & Nancy	02N17E00005500, 02N17E00005200, 02N17E00005300	444	No	Dryland wheat farming and BCWF turbines and access road. Homesite and farm structures.
MacNab, Dennis K. Trustee	02N17E00005000	157	No	Dryland wheat farming and BCWF turbines and access road.

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

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

Typical interference or potential adverse impacts to the accepted farming practices in the surrounding area that may occur during facility construction may include construction traffic, spread of noxious weeds, damage to crops, or other nuisance from construction dust. Potential impacts related to glare, wildfire, and/or limitations to farmland access are also evaluated in this section although not listed in OAR 660-033-0130(5)(c)(D). The Certificate Holder evaluates whether these potential impacts rise to the level of significant in the discussion below and demonstrates that the Solar Facility as proposed under RFA 5 will be made compatible with other adjacent uses through the implementation of BMPs and mitigation measures and will not result in significant impacts to farming practices on surrounding lands.

Traffic

As discussed in Exhibit L, the primary and secondary transportation routes for the RFA 5 Solar Facility will be the same as for the BCWF. Many of the landowners involved in RFA 5 were also operating during the construction of the BCWF and have stated in their survey response that, while there were some impacts to their operations from traffic, these were mitigated through a construction traffic management plan and coordinating traffic schedules around farm management road access needs. County roadway traffic volumes are assumed to be minimal, with some increase in traffic during the summer and early fall for harvest of various crops in the area. Construction and operation of the RFA 5 Solar Facility will temporarily increase the traffic volume within the primary transportation route. However, construction-related traffic typically occurs during off-peak hours. Construction trucks typically use roads in the middle of the day during off-peak hours. Private vehicle traffic will also generally occur out of phase with the truck traffic, as the workers report earlier and leave later than most of the truck traffic. Overall, construction activities may cause short-term traffic delays, but they will be temporary and can be minimized by implementing specific measures outlined in Exhibit L. The Certificate Holder will encourage carpooling for construction workers and include traffic safety as part of its safety training program. To ensure that construction activities are compatible with day-to-day farm operations, a Construction Traffic Management Plan will be developed prior to construction, in accordance with Site Certificate Condition PRE-PS-02. This plan will include traffic minimization measures at transportation route roads, which would be implemented as needed; staggering shift start times to reduce vehicle trips through the westbound I-84 ramp terminal at Biggs Junction; installation of temporary traffic controls during peak construction; and other mitigation measures, as applicable. Also, the Certificate Holder will ensure that any wear or damage to county roads as a result of the proposed RFA 5 Solar Facility is repaired and that roads are restored to pre-construction condition or better.

After construction is complete, only four full-time employees are anticipated to be visiting the site daily. This will result in minimal impacts to the existing traffic using the roads in the vicinity of the Solar Components. Occasionally, additional vehicles or trucks may be required for maintenance and operations, but this will be an infrequent occurrence.

Water Availability and Delivery

There are no irrigation place of use water rights within the surroundings lands; therefore, all other crops grown within the surroundings lands are dryland crops and do not require irrigation. There are no crops within the surrounding lands supported by water delivery; as a result, water delivery will not be significantly impacted.

As described in Exhibit L, water for construction and operation will be obtained from the City of Wasco through the municipality's existing water rights and trucked to the site. The Certificate Holder may also source some water from an on-site exempt well provided such use of well water would not cause the rate of extraction to exceed 5,000 gallons in any one-day period.

Due to water either being trucked in from off-site or within the 5,000 gallons per day exemption threshold and the majority of crops within the surrounding lands being dryland crops, there is no expectation that water availability will be significantly impacted.

Weeds and Pests

The Certificate Holder will control the introduction and spread of noxious weeds in accordance with the methods, monitoring procedures, and success criteria set forth in the draft Comprehensive Solar Revegetation and Soil Management Plan (Exhibit C, Attachment C-2). The Certificate Holder currently contracts with the Sherman County Weed Control District to perform weed control actions in the Weed Management Area at BCWF and the RFA 4 Solar Facility. Weed control has been effective, with periodic monitoring and treatment occurring during construction. The Certificate Holder will continue to use Sherman County Weed Control District services to treat the Solar Siting Area, contingent upon their capacity to perform the work. If the District is unable to provide these services, the Certificate Holder will engage another qualified weed-control provider. Weed management BMPs include flagging and treating areas of noxious weed infestations prior to construction, cleaning vehicles and equipment prior to ground disturbance, strategic use of herbicide, mechanical removal, and revegetation of disturbed soils. Additional steps may include monitoring areas of disturbance for noxious weeds after construction, training construction and operations staff and limiting vehicle traffic in noxious weed-infested areas. Using these BMPs during construction and operation will reduce the risk of weed infestation in cultivated land and the associated cost to the farmer for weed control (see the draft Comprehensive Solar Revegetation and Soil Management Plan in Exhibit C, Attachment C-2).

Damage to Crops or Livestock

No damage to crops or livestock in the surrounding lands is anticipated from the construction and operation of the Solar Facility as proposed under RFA 5 . One of the landowners leasing land to the Certificate Holder has current experience operating active farmland adjacent to the existing Wy'East solar facility, which is located southeast of the proposed Solar Siting Area. The landowner stated there had been no issues operating their dryland wheat farm next to the existing solar energy facility (see Attachment D-1, interview with Tract 3 landowner). Concerns for the spread of dust during construction are addressed below. Concerns for spread of noxious weeds are addressed above.

Litter and Trespass

Generation of waste from construction will be minimized through the detailed estimating of materials and through efficient construction BMPs. As discussed in Exhibit N, solid waste will be stored in a manner that does not constitute a fire, health, or safety hazard until such waste can be hauled off-site for recycling or disposal, as appropriate. Disposal and recycling containers will be of adequate size, design, and number to handle the amount of waste being generated. Containers approximately 10 tons in capacity will be used to collect scrap metal, wood, and paper products, and other recyclable materials. Removal of the waste to appropriate disposal facilities will be done by a licensed waste hauler, under contract to the construction contractor (Site Certificate Condition

PRE-WM-01). Licensed waste haulers must comply with OAR 340-093-0220 for transportation of wastes. Disturbed soil and rock materials will be contained using appropriate BMPs as part of the NPDES 1200-C permit to prevent sedimentation release to local habitat. Wastes generated at the proposed O&M building will be collected in appropriate waste or recycling containers, to be removed by a licensed waste hauler. All operational waste will be handled according to the Operations Waste Management Plan (Site Certificate Condition OPR-WM-02). As discussed in Exhibit N, the Certificate Holder will implement a Construction Waste Management Plan for the RFA 5 Solar Facility. The plan will include measures to segregate all hazardous and universal wastes such as used oil, oily rags, mercury-containing lights, and lead-acid and nickel-cadmium batteries for disposal by a licensed firm that specializes in their proper recycling/disposal. Office waste generated at the proposed O&M building will be disposed of at the Wasco County Landfill or Columbia Ridge Landfill.

The Certificate Holder has coordinated and will continue to coordinate with the Sherman County Sheriff's Office to verify they will be able to provide law enforcement services to the RFA 5 Solar Facility in the event of an emergency without impacting services to other areas under their jurisdiction (Exhibit L, Attachment L-1). If needed, additional law enforcement service is available through the Oregon State Police, with offices in The Dalles, Heppner, and Hermiston, and through The Dalles Police Department. The Solar Components will be entirely fenced with security gates at vehicle entry points. After construction is complete, up to four full-time employees are anticipated to be visiting the site daily.

Reduction in Crop Yields

The Solar Components will be entirely enclosed within the Solar Site Boundary and will not be located within the surrounding lands. As discussed above, traffic will be managed during construction to prevent disruptions in adjacent farm management schedules, and the introduction and spread of noxious weeds will be prevented through methods set forth in the draft Comprehensive Solar Revegetation and Soil Management Plan (Exhibit C, Attachment C-2). The Certificate Holder currently contracts with the Sherman County Weed Control District to inspect and treat weeds at BCWF. There is active crop cultivation adjacent to the existing Wy'East solar facility, which is located southeast of the proposed Solar Components and the landowner has stated that there are no issues operating their farm practices (dryland wheat cultivation) adjacent to the existing solar energy facility.

Flooding

No portion of the surrounding land is located within the regulated floodplain (Exhibit B, Figure B-3). The Solar Facility as proposed is not anticipated to cause flooding within the surrounding lands due to stormwater runoff or on-site water use. The Certificate Holder will monitor construction stormwater impacts in accordance with an NPDES 1200-C construction stormwater permit issued by the Oregon Department of Environmental Quality, and an associated ESCP (Site Certificate Condition PRE-SP-01; see Exhibit C for further information). The ESCP describes BMPs for erosion and sediment control, spill prevention and response procedures, proper disposal procedures, regular maintenance for vehicles and equipment, and employee training on spill prevention. During

operation, any sediment-laden stormwater runoff will be contained within the Solar Siting Area and infiltrate into the soils. If needed, solar panel washing will occur during the summer and will use quantities of water that will evaporate or will infiltrate into the ground within the immediate vicinity of its use.

Glare

Solar arrays reflect light that can interfere with road and air travel. As discussed in Exhibit I Section 4.2.2, a glare analysis was completed for the Solar Components using a modeling/compliance analysis tool within the GlareGauge software application. Glare is categorized using three tiers of severity: red (glare predicted with a potential for permanent eye damage), yellow (glare predicted with a potential for temporary after-image), and green (glare predicted with a low potential for temporary after-image).

As provided by Exhibit I, the results of this analysis indicate no instances of red glare are predicted for any observation point or route segments modeled, while the amount of annual hours of green and yellow glare was considered insignificant. In addition, this is a conservative prediction as the GlareGauge model does not account for varying ambient conditions (i.e., cloudy days, precipitation), atmospheric attenuation, screening due to existing vegetation or structures unless specified through obstruction modeling, and screening due to existing topography not located within the defined array layouts. As such, the predicted results are considered conservative and likely significantly lower than predicted.

Dust

The Certificate Holder will minimize dust during construction through application of water and other dust control measures as discussed in Exhibit C. Water for dust control will be sprayed onto disturbed areas by water truck during construction (per Site Certificate Condition PRE-SP-01). Water trucks will be used to control dust generation throughout the construction site, in all disturbed areas including but not limited to foundation installations and trenching for collector lines. Water for dust control and road compaction will be applied via tanker truck in a manner that avoids erosion and sediment discharge and is consistent with the best management practices presented in the NPDES 1200-C permit (Site Certificate Condition PRE-SP-01). During operation, dust generation as a result of Project activities is expected to be minimal. The solar panels will help safeguard soil health by protecting soils from wind and soil erosion through vegetation establishment under solar panels. There may be periodic washing of the solar modules to minimize the effects of dust and dirt on energy production which will be dependent on weather conditions (e.g., during drought conditions when there is more dust the panels may require washing).

Wildfire

Wildfire prevention and risk mitigation for the Solar Facility as proposed under RFA 5 are addressed in Exhibit M. The Certificate Holder and Project Developer have prepared a draft construction Wildfire Mitigation Plan (WMP; Exhibit M, Attachment M-1) and operational WMP (Exhibit M, Attachment M-2) that is included with this RFA. Additionally, PGE is an investor-owned utility with governance from the Oregon Public Utility Commission that provides electric service in

Oregon and is subject to the requirements of OAR 860, Division 300, which requires PGE to have a risk-based WMP filed and approved by the Public Utility Commission.

Prior to construction and operations, the Certificate Holder and Project Developer will coordinate with local fire districts, as well as local emergency management agencies, to receive and incorporate input into the final WMPs. The Solar Facility will be equipped with fire protection equipment in accordance with the Oregon Fire Code, and operations will be performed in accordance with the WMP. Through compliance with fire safety standards and the implementation of a fire protection and prevention plan, the Certificate Holder will minimize the risk of wildland fire during construction and operation.

Summary of Potential Impacts to Individual Farm Practices

As shown in Table D-7, there are 12 landowners within the surrounding lands. All of the land within the surrounding lands is being farmed. There is a mixture of land being farmed by their respective landowners and land being farmed through lease agreements. These lease agreements are not publicly available. The farm practices identified are predominantly dryland wheat cultivation.

In summary, none of the impacts discussed above have risen to the level of significant for the dryland wheat. The potential impacts either do not impact the farm operations within the surrounding lands to a significant level or are mitigated such that the impacts remain minimal.

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

None of the impacts discussed above under Potential Impacts to Farm Practices During Construction and Operation of Solar Facility as proposed under RFA 5 have risen to the level significant enough to have an important influence or effect on that operation. Prevention, mitigation, and monitoring efforts discussed above and in Exhibits B, C, G, I, L, M, and N collectively alleviate potential impacts from traffic, water availability and delivery, weeds and pests, damage to crops or livestock, litter and trespassing, reduction in crop yields, flooding, glare, dust, and wildfire. There are no unique farm practices within the surrounding lands requiring special site conditions that would be at risk due to the Solar Facility.

As noted elsewhere in this exhibit, each of the four landowners with agricultural lands in the RFA 5 Site Boundary was sent a survey with questions regarding the agricultural uses of their lands, including lands within and outside the Solar Siting Area (see Table D-7). The survey requested information about their concerns for impacts to adjacent farming operations and any concerns from their experience with construction of other energy facilities in the surrounding area including BCWF. All of the responses indicated that they had no concerns with potential impacts from the solar facility on their ongoing farmlands outside the fence line. Some landowners indicated that communication with the neighboring farmers will help coordinate minimization of impacts from construction activities and construction traffic. The landowner responses (Table D-7) described no anticipated negative impact on their other agricultural operations. Further, those landowners who currently host wind turbines on their properties did not have major concerns regarding construction of the solar arrays on their surrounding farmlands.

The Solar Facility as proposed under RFA 5 is not anticipated to significantly increase the cost of accepted farm practices on surrounding lands.

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

OAR 660-033-0130(5)(c)(F) is directed to the County/EFSC and does not require findings from the Certificate Holder.

OAR 660-033-0130(5) Conclusion

For the above stated reasons, the Council may find that the Solar Facility as proposed under RFA 5 will not significantly change the accepted farming practices within the surrounding area. Because the Solar Facility as proposed under RFA 5 will not result in significant impacts, the Council can draw the conclusion that the Solar Facility will also not result in significant costs to accepted farming practices. Therefore, the Solar Facility as proposed under RFA 5 will not seriously interfere with accepted farming practices on adjacent lands devoted to farm use.

5.4.3 OAR 660-033-0130(38)

Minimum Standards Applicable to the Schedule of Permitted and Conditional Uses

> *(38) A proposal to site a photovoltaic solar power generation facility shall be subject to the following definitions and provisions:*
>
> > *(a) "Arable land" means land in a tract that is predominantly cultivated or, if not currently cultivated, predominantly comprised of arable soils.*
> >
> > *(b) "Arable soils" means soils that are suitable for cultivation as determined by the governing body or its designate based on substantial evidence in the record of a local land use application, but "arable soils" does not include high-value farmland soils described at ORS 195.300(10) unless otherwise stated.*
> >
> > *(c) "Dual-use development" means developing the same area of land for both a photovoltaic solar power generation facility and for farm use.*
> >
> > *(d) "Nonarable land" means land in a tract that is predominantly not cultivated and predominantly comprised of nonarable soils.*
> >
> > *(e) "Nonarable soils" means soils that are not suitable for cultivation. Soils with an NRCS agricultural capability class V–VIII and no history of irrigation shall be considered nonarable in all cases. The governing body or its designate may determine other soils, including soils with a past history of irrigation, to be nonarable based on substantial evidence in the record of a local land use application.*

The above definitions have been used to determine the land categories for the Solar Siting Area. As discussed in Section 3.3.2.3 and Table D-5 above, all tracts within the Solar Siting Area comprise arable land. No dual-use development is proposed as part of the Solar Facility as proposed under RFA 5. While some nonarable soils exist within the Solar Siting Area, there is no "nonarable land."

(f) "Photovoltaic solar power generation facility" includes, but is not limited to, an assembly of equipment that converts sunlight into electricity and then stores, transfers, or both, that electricity. This includes photovoltaic modules, mounting and solar tracking equipment, foundations, inverters, wiring, storage devices and other components. Photovoltaic solar power generation facilities also include electrical cable collection systems connecting the photovoltaic solar generation facility to a transmission line, all necessary grid integration equipment, new or expanded private roads constructed to serve the photovoltaic solar power generation facility, office, operation and maintenance buildings, staging areas and all other necessary appurtenances. For purposes of applying the acreage standards of this section, a photovoltaic solar power generation facility includes all existing and proposed facilities on a single tract, as well as any existing and proposed facilities determined to be under common ownership on lands with fewer than 1,320 feet of separation from the tract on which the new facility is proposed to be sited. Projects connected to the same parent company or individuals shall be considered to be in common ownership, regardless of the operating business structure. A photovoltaic solar power generation facility does not include a net metering project established consistent with ORS 757.300 and OAR chapter 860, division 39 or a Feed-in-Tariff project established consistent with ORS 757.365 and OAR chapter 860, division 84.

The proposed Solar Components meet the definition of "photovoltaic solar power generation facility." The Solar Components will include solar arrays, inverters, BESS facilities and their subcomponents (i.e., inverters), collector substation, 34.5-kV collector lines, O&M structures, site access roads, internal roads, perimeter fencing, facility entry gates, and temporary laydown areas. The BESS facility will be located near the collector substation within the Solar Siting Area.

The proposed gen-tie line is not included in the definition of "photovoltaic solar power generation facility." Instead, as directed by EFSC, proposed transmission lines connecting the solar facility to the electrical grid are treated as utility facility necessary for public service pursuant to ORS 215.283(1)(c) if the standards of ORS 215.274 are met. Compliance with ORS 215.274 is discussed in Section 5.4.1 above.

(g) For high-value farmland described at ORS 195.300(10), a photovoltaic solar power generation facility shall not use, occupy, or cover more than 12 acres unless:

(A) The provisions of paragraph (h)(H) are satisfied; or

(B) A county adopts, and an applicant satisfies, land use provisions authorizing projects subject to a dual-use development plan. Land use provisions adopted by a county pursuant to this paragraph may not allow a project in excess of 20 acres. Land use provisions adopted by the county must require sufficient assurances that the farm use element of the dual-use development plan is established and maintained so long as the photovoltaic solar power generation facility is operational or components of the facility remain on site. The provisions of this subsection are repealed on January 1, 2022.

The definition of high-value farmland under ORS 195.300(10)(a) cites ORS 215.710, which describes land in a tract composed predominantly of high-value farmland soils, that at the time of the siting approval, are irrigated and classified as prime, unique, Class I, or Class II or not irrigated and classified as prime, unique, Class I, or Class II. As such, soil characteristics for all lots and parcels under common ownership also need to be analyzed. As discussed above in Section 3.3.2.2 and shown in Table D-4, there are more than 12 acres of high-value farmland per ORS 195.300(10)(a) and (f) within the Solar Siting Area. Due to the irregular and dispersed nature of the high-value farmland as shown on Figure D-7, the Solar Components are unable to avoid the use of less than 12 acres of high-value farmland. As a result, the criteria of OAR 660-033-0130(38)(h) will apply and an exception to Goal 3 is required. See Section 5.6 for the statewide planning Goal 3 exception justification.

> *(h) The following criteria must be satisfied in order to approve a photovoltaic solar power generation facility on high-value farmland described at ORS 195.300(10).*
>
> > *(A) The proposed photovoltaic solar power generation facility will not create unnecessary negative impacts on agricultural operations conducted on any portion of the subject property not occupied by project components. Negative impacts could include, but are not limited to, the unnecessary construction of roads dividing a field or multiple fields in such a way that creates small or isolated pieces of property that are more difficult to farm, and placing photovoltaic solar power generation facility project components on lands in a manner that could disrupt common and accepted farming practices;*

As shown in Background Exhibit Figure 2, no small or isolated pieces of property will be created as a result of the Solar Siting Area. Solar arrays and facility components are located in the areas of the Solar Siting Area not used by the BCWF wind turbines and are set back from wetlands, protected habitats, and steep slopes. According to landowner testimony, all the farmers operating within the Solar Siting Area intend to continue their farming operations on lands outside the Solar Siting Area and do not anticipate issues. All local public roads adjacent to and within the Solar Siting Area will remain outside of the fenced area. As described in Exhibit L, traffic during the operation of RFA 5 will be minimal with up to four personnel for daily maintenance activities.

As discussed above in Section 5.2, farming on surrounding lands will continue alongside the Solar Components without a significant change to accepted farming practices and without an increase to the cost of those accepted farm practices. Survey responses provided by the landowners did not identify or anticipate any adverse impact, or any increase in the cost of farming practices, in the vicinity of the solar arrays. No forest practices or viticulture occur within the Solar Siting Area or surrounding lands. Potential impacts such as traffic, dust, glare, wildfire, weeds, noise, or emissions will not occur or will be mitigated through management plans as provided in Exhibits C, G, I, L, and M and their attachments. The Solar Components will safeguard soil health by protecting soils from wind and soil erosion and minimizing construction impacts using ESCP BMPs (see Exhibit C) and by promoting long-term vegetation establishment under solar panels due to no soil tillage during operation of the Solar Components. The Certificate Holder will sign and record in the deed records

of Sherman County a document prohibiting them from pursuing a claim for relief or cause of action alleging injury from farming practices as defined in ORS 30.930(2) and (4). Post-construction, the Solar Components will not result in increased traffic impacts, air emissions, or dust from ongoing agricultural use, in consideration of drought conditions that could become longer and more severe due to climate change. Common and accepted farming practices may need to change in response to changing conditions, and accessory uses, such as temporary long-term leases, may become more reliable sources of income.

The solar arrays are generally oriented adjacent and parallel to existing roads (see Background Exhibit Figure 2) and have been sited to maximize efficiency while also consolidating the solar arrays to areas that do not constrain the current and future dryland wheat farming activities on the remainder of the tracts or on neighboring tracts. Access roads will not be constructed outside of the solar array fence line. The Certificate Holder will design and construct the Solar Components using the minimum land area necessary for safe construction and operation. The Solar Components will utilize existing access roads to the extent practicable. The Solar Components will not create negative impacts on agricultural operations conducted on any portion of the subject property not occupied by Solar Components because:

- The Solar Components will not limit or impact current or future farm activities on the surrounding land and will not diminish the opportunity for neighboring parcels to expand, purchase, or lease any vacant land available for agricultural uses.
- The Certificate Holder will implement a Comprehensive Solar Revegetation and Soil Management Plan, which is Attachment C-2 to Exhibit C, during construction and operation that will reduce the risk of weed infestation in cultivated land and the associated cost to the farmer for weed control.
- Construction of the Solar Components could adversely affect soil quality by erosion or compaction. Some farmland would be temporarily disturbed and unavailable for farming during construction. To avoid or reduce adverse impacts to soil quality, the Certificate Holder will implement dust control and erosion control measures during construction and operation of the Solar Components (see Exhibit C). To the extent practicable, the Certificate Holder proposes to reduce impact to soils by using areas that are already disturbed and limiting the area of new disturbance.

Ultimately, construction, operation, and maintenance of the Solar Components will not change existing land use practices on lands surrounding the Solar Siting Area.

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

The prevention of soil erosion is discussed in Exhibit C. Construction will be performed under an NPDES 1200-C permit, including an Oregon Department of Environmental Quality ESCP, which will also include erosion and sediment control BMPs. After completing construction within RFA 5, the Certificate Holder will monitor the area and coordinate with the landowners, who understand the specifics about the land, to evaluate whether construction-related impacts to soils are being adequately addressed by the mitigation procedures described in the Draft ESCP (see Exhibit C, Attachment C-1) and the draft Comprehensive Solar Revegetation and Soil Management Plan (see Exhibit C, Attachment C-2).

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

The extent of grading during construction of Solar Components will be limited to specific areas within the Solar Siting Area. Additionally, potential soil impacts during construction, operation and decommissioning and prevention and mitigation strategies are discussed in Exhibit C. This document, in addition to the Draft ESCP (see Exhibit C, Attachment C-1), meets the requirement for a plan prepared by an adequately qualified individual as required by the above standard.

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

The Certificate Holder has prepared a draft Comprehensive Solar Revegetation and Soil Management Plan (see Exhibit C, Attachment C-2) to address prevention, monitoring, and control measures for noxious weeds in Sherman County. This plan was prepared using the Sherman County noxious weed list (Sherman County 2024). At the time of RFA submittal, the plan will be reviewed by Sherman County and ODOE and will be subject to comment and approval by both agencies.

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

As discussed in Section 3.3 above, the majority of tracts within the Solar Siting Area are predominantly composed of those high-value farmland soils listed in OAR 660-033-0020(8)(a). It is not possible to site the solar arrays completely avoiding the OAR 660-033-0020(8)(a) high-value farmland soils primarily due to the patchy and irregular nature of the Class II soils (see Figure D-6) throughout the tracts. As the Solar Components will preclude more than 12 acres of high-value

farmland from use as a commercial agricultural enterprise, a Goal 3 exception is being requested pursuant to ORS 469.504(1)(b) and OAR 345-022-0030(4) (see Section 5.6).

> *(F) The project is not located on those high-value farmland soils listed in OAR 660-033-0020(8)(b)-(e) or arable soils unless it can be demonstrated that:*
>
> > *(i) Non high-value farmland soils are not available on the subject tract;*
> >
> > *(ii) Siting the project on non high-value farmland soils present on the subject tract would significantly reduce the project's ability to operate successfully; or*
> >
> > *(iii) The proposed site is better suited to allow continuation of an existing commercial farm or ranching operation on the subject tract than other possible sites also located on the subject tract, including those comprised of non high-value farmland soils; and*

OAR 660-0033-0020(c), (d), and (e) provide definitions for high-value farmland for land within the Willamette Valley, west of the summit of the Coast Range, and west of U.S. Highway 101, respectively, and are not applicable to RFA 5. OAR 660-0033-0020(b) is specific to the production of "specified perennials," which are defined as perennials grown for market or research purposes including, but not limited to, nursery stock, berries, fruits, nuts, Christmas trees, or vineyards, but not including seed crops, hay, pasture or alfalfa. As provided by the landowner testimony, no specified perennials are grown within the Solar Siting Area. Instead, the land is used for crops such as seed crops, hay, pasture, alfalfa, wheat, and barley. As a result, the Solar Siting Area is not located on those high-value farmland soils listed in OAR 660-033-0020(8)(b)-(e).

Per OAR 660-033-0130(38)(b), "'arable soils' means soils that are suitable for cultivation as determined by the governing body or its designate based on substantial evidence in the record of a local land use application, but 'arable soils' does not include high-value farmland soils described at ORS 195.300(10) unless otherwise stated."

As shown on Figure D-4, almost the entirety of the Solar Siting Area is shown as land in cultivation. Additionally, as discussed above in Section 3.3.2.3 and shown in Table D-1, 1,244 acres, or 100 percent, of the Solar Siting Area consists of arable soils.

Some non-high-value farmland soils are available on the subject tract, as shown on Figure D-7. However, as also shown on Figure D-7, due to the irregular and dispersed pattern and the limited quantity of the non-high-value farmland soils, it would not be possible to site the solar energy facility components on only non-high-value farmland soils without significantly impairing the ability of the Solar Facility as proposed under RFA 5 to operate successfully.

With the exception of Tract 1, the entirety of the remaining tracts will be within the Solar Siting Area. The portions of Tract 1 located within the Solar Siting Area are connected to the other land within the fence line in such a way as to prevent the creation of farmland islands by creating a consolidated area of land within Solar Siting Area. The portion of Tract 1 located outside the Solar Siting Area is adjacent to a public road and may continue to be used for cultivation.

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

(i) If fewer than 48 acres of photovoltaic solar power generation facilities have been constructed or received land use approvals and obtained building permits within the study area, no further action is necessary.

(ii) When at least 48 acres of photovoltaic solar power generation facilities have been constructed or received land use approvals and obtained building permits, either as a single project or as multiple facilities within the study area, the local government or its designate must find that the photovoltaic solar power generation facility will not materially alter the stability of the overall land use pattern of the area. The stability of the land use pattern will be materially altered if the overall effect of existing and potential photovoltaic solar power generation facilities will make it more difficult for the existing farms and ranches in the area to continue operation due to diminished opportunities to expand, purchase or lease farmland, acquire water rights, or diminish the number of tracts or acreage in farm use in a manner that will destabilize the overall character of the study area.

As shown on Figure D-10, no PV solar power generation facilities have been constructed or received land use approvals and obtained building permits within the 1-mile analysis area. As a result, no further action is necessary.

(H) A photovoltaic solar power generation facility may be sited on more than 12 acres of high-value farmland described in ORS 195.300(10)(f)(C) without taking an exception pursuant to ORS 197.732 and OAR chapter 660, division 4, provided the land:

(i) Is not located within the boundaries of an irrigation district;

(ii) Is not at the time of the facility's establishment, and was not at any time during the 20 years immediately preceding the facility's establishment, the place of use of a water right permit, certificate, decree, transfer order or ground water registration authorizing the use of water for the purpose of irrigation;

(iii) Is located within the service area of an electric utility described in ORS 469A.052(2);

(iv) Does not exceed the acreage the electric utility reasonably anticipates to be necessary to achieve the applicable renewable portfolio standard described in ORS 469A.052(3); and

(v) Does not qualify as high-value farmland under any other provision of law; or

As discussed in Section 3.3.2.2 above, an exception to Goal 3 pursuant to ORS 197.732 and OAR Chapter 660, Division 4 is required.

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

As discussed in Section 3.3.2.2 above, an exception to Goal 3 pursuant to ORS 197.732 and OAR Chapter 660, Division 4 is required.

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

The Certificate Holder acknowledges this condition of approval.

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

A bond or other security is required by the Council and the security is issued in the name of the State. The Certificate Holder is providing financial assurance for site restoration after facility retirement as provided in Exhibit F.

> *(n) If ORS 469.300(11)(a)(D) is amended, the commission may re-evaluate the acreage thresholds identified in subsections (g), (i) and (j) of this section.*

The Certificate Holder acknowledges the above criterion.

5.5 Non-compliance with Applicable Substantive Criteria – OAR 345-022-0030(7)(b)(C)(iv)

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

As discussed in Section 5.4.3, the Solar Components do not meet the standards under OAR 660-033-0130(38)(g) and (h) as they will permanently occupy more than 12 acres of high-value farmland and more than 20 acres of arable land for the commercial solar energy facility. Further, as discussed in Section 5.2.5.3, the standards of SCZO 5.8.20.4 cannot be met as the soils within the Solar Siting Area are generally suitable for the production of farm crops and livestock. Because the Solar Components do not comply with all applicable local land use criteria, this section provides analysis, under ORS 469.504(1)(b)(B) on whether the proposed Solar Components "otherwise comply with the applicable statewide planning goals." For a use located within an EFU zone, the "applicable statewide planning goal" is Goal 3, which is the State's Agricultural Lands goal. Thus, the RFA 5 Solar Components requires an exception to Statewide Planning Goal 3 pursuant to ORS 469.504(2)

and OAR 345-022-0030(4). The justification for an exception to Statewide Planning Goal 3 is set forth in Section 5.6 below.

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

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

As discussed in Sections 5.4.3, the RFA 5 Solar Facility does not meet the standards under OAR 660-033-0130(38)(g) and (h) as more than 12 acres of high-value farmland and more than 20 acres of arable land will be occupied within the Solar Siting Area and therefore a goal exception is required under ORS 469.504(1)(b)(B). For a use located within an EFU zone, the "applicable statewide planning goal" is Goal 3, which is the State's Agricultural Lands goal. Thus, the Solar Components require an exception to Statewide Planning Goal 3 pursuant to ORS 469.504(2) and OAR 345-022-0030(4).

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

> *ORS 469.504(2)(a): The council may find goal compliance for a facility that does not otherwise comply with one or more statewide planning goals by taking an exception to the applicable goal. Notwithstanding the requirements of ORS 197.732, the statewide planning goal pertaining to the exception process or any rules of the Land Conservation and Development Commission pertaining to an exception process goal, the council may take an exception to a goal if the council finds:*
>
> *(A) The land subject to the exception is physically developed to the extent that the land is no longer available for uses allowed by the applicable goal;*
>
> *(B) The land subject to the exception is irrevocably committed as described by the rules of the Land Conservation and Development Commission to uses not allowed by the applicable goal because existing adjacent uses and other relevant factors make uses allowed by the applicable goal impracticable; or*
>
> *(C) The following standards are met:*
>
> > *(i) Reasons justify why the state policy embodied in the applicable goal should not apply;*
> >
> > *(ii) The significant environmental, economic, social and energy consequences anticipated as a result of the proposed facility have been identified and adverse impacts will be mitigated in accordance with rules of the council applicable to the siting of the proposed facility; and*
> >
> > *(iii) The proposed facility is compatible with other adjacent uses or will be made compatible through measures designed to reduce adverse impacts.*

The Solar Siting Area is not "physically developed" or "irrevocably committed" within the meaning of the rule. However, the Certificate Holder demonstrates that the RFA 5 Solar Facility meets the standards under ORS 469.504(2)(a)(C) as further discussed in Sections 5.6.1, 5.6.2, and 5.6.3.

5.6.1 Demonstration that a "Reasons" Exception is Appropriate

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

The Certificate Holder relies on the reason set forth in ORS 469.504(2)(b) to justify why the Goal 3 policies should not apply to the Solar Components. The Oregon Legislature amended ORS 469.504 in 2026 through House Bill 4076 to codify in statute a justifiable reason for a Goal 3 exception[9] The Oregon Legislature directs Council to find that a justifiable reason has been presented under ORS 469.504(2)(a)(C)(i) (i.e., the "reasons for goal exception") if the Certificate Holder shows that the Solar Components meet the requirements of ORS 469.504(2)(b).

ORS 469.504(2)(b):

> *(A) The council shall find that the standards under paragraph (a)(C)(i) of this sub section are met if the council finds that the proposed energy facility:*
>
> > *(i) Will deliver electricity to the electric grid utilizing an existing energy facility's surplus interconnection; and*
> >
> > *(ii) Does not require associated transmission lines more than two miles from the site boundaries of the existing energy facility.*
>
> *(B) As used in subparagraph (A) of this paragraph, "surplus interconnection" means any capacity at the point of interconnection under an existing energy facility's interconnection agreement that is not being utilized and does not exceed the original interconnection capacity of the existing energy facility.*

The Certificate Holder meets the provisions under ORS 469.504(2)(b)(A) as follows:

ORS 469.504(2)(b)(A)(i)

The Certificate Holder has a large generator interconnection agreement (LGIA) with BPA to deliver electricity generated by BCWF to BPA's system. The LGIA allows the Certificate Holder to deliver up to 450 MW of electricity from the Biglow Canyon Substation (POI) via the BPA 230-kV Biglow Canyon-John Day transmission line to the John Day Substation. The Certificate Holder proposes to utilize surplus interconnection service with the BPA, which allows new generation and/or energy storage resources to use an existing electrical point of interconnection. The new resources will be

[9] Final Enrolled HB 4076 available at: https://olis.oregonlegislature.gov/liz/2026R1/Downloads/MeasureDocument/HB4076/Enrolled. The legislative intent of HB 4076 is to help implement Executive Orders (EO) 25-25 and EO 25-29 that were issued by Governor Kotek in 2025 to support Oregon's clean energy development. See Staff Measure Summary for HB 4076 available here: https://olis.oregonlegislature.gov/liz/2026R1/Downloads/MeasureAnalysisDocument/94745

located behind the existing POI and will be operated and controlled so that the combined electrical output does not exceed the existing interconnection limit. This approach allows the existing interconnection infrastructure to be utilized more efficiently while maintaining the established injection limit to the transmission system. PGE submitted a Surplus Interconnection Service Request to BPA for the RFA 5 Solar Components; Attachment D-4 contains a redacted copy of the request form.

ORS 469.504(2)(b)(A)(ii)

RFA 5 requires an approximately 2.7-mile overhead gen-tie line to deliver the power from the Solar Components to the Biglow Canyon Substation; however, this new overhead transmission line is entirely located within the existing BCWF site boundary (see Background Exhibit Figure 1). Therefore, RFA 5 does not require an associated transmission line more than 2 miles from the site boundary of the existing BCWF site boundary and ORS 469.504(2)(b)(A)(ii) is met.

The Oregon Legislature provides clear direction that using surplus interconnection capacity under an existing LGIA and not requiring a transmission line more than 2 miles from the site certificate boundary provides a reason justifying the requested goal exception and demonstrates compliance with ORS 469.504(2)(a)(C)(i).

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

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

ORS 469.504(2)(a)(C)(ii) and OAR 345-022-0030(4)(c)(B) require a goal exception to balance the potential consequences and benefits of the Solar Components on the environment, economy, social resources and energy resources. The Certificate Holder has sited the Solar Components to minimize its environmental, socioeconomic, and energy impacts as follows.

Environmental

- Solar energy is considered a non-polluting industry and is an internationally recognized clean, renewable source of energy. Operation of the Solar Components will not result in any air pollutant emissions.
- Implementation of the NPDES Construction Stormwater Discharge General Permit 1200-C will cause the Solar Components to avoid and minimize potential impacts to the area's water quality.
- Wind erosion is influenced by wind intensity, vegetative cover, soil texture, soil moisture, the grain size of the unprotected soil surface, topography, and the frequency of soil disturbance. Control measures will be implemented to mitigate wind erosion potential as identified in Exhibit C.

- The Solar Components will prevent disturbance to natural habitats and wildlife by being sited primarily on agricultural lands, which are considered already disturbed. High-value farmlands and lands dedicated to agricultural use are found throughout the Solar Siting Area and the surrounding vicinity, such that any chosen location in the general area will be likely to encompass similar proportions of both high-value farmland and agricultural lands.
- The region has warmed nearly 2 degrees Fahrenheit since 1900 because of increased greenhouse gas emissions (Dalton et al. 2017). This warming includes warmer waters that affect both river and coastal ecosystems, threatening salmon runs and other important marine and freshwater species. Additionally, in eastern Oregon, large mountain areas have suffered mountain pine beetle infestations, wildfires, or both, causing widespread shifts in forest ecosystems (Dalton et al. 2017). As stated above, recent legislation aims to address the climate crisis by accelerating the clean energy transition in Oregon. One of the measures identified to accomplish this is through supporting renewable energy development such as solar facilities. Therefore, the Solar Components contribute to the reduction of greenhouse gas emissions, which may result in a beneficial environmental impact.
- At the conclusion of the life of the RFA 5 Solar Facility, the Solar Components will be decommissioned and the land returned to its pre-construction state, and will thus present only a temporary change to the land use that is not irrevocably committed to a new urbanized use. Per the terms of the lease and consistent with a Retirement Plan to be approved by applicable agencies (see Exhibit F), the land would be restored for future agricultural use. For these reasons, the Solar Components will only be a temporary removal of farmland. See Exhibit M for evidence that the Certificate Holder has a reasonable likelihood of obtaining a bond or letter of credit in the amount estimated to be required to restore the site. Additionally, as described earlier and in Exhibit I, the Solar Components will be compatible with future farmland uses as soil health will be safeguarded by protecting soils from wind and soil erosion and minimizing construction impacts and vegetation under solar panels.
- The environmental consequences of the RFA 5 Solar Facility as a whole are discussed primarily in Exhibit C (Soil Protection), Exhibit O3 (Wetlands and Other Jurisdictional Waters), Exhibit E (Protected Areas), Exhibit G (Fish and Wildlife Habitat), Exhibit H (Threatened and Endangered Species), Exhibit I (Scenic Resources), and Exhibit J (Cultural Resources). These exhibits demonstrate that the RFA 5 Solar Facility will not cause significant adverse environmental consequences. Overall, the proposed changes will avoid impacts to such resources altogether. The Certificate Holder will mitigate for unavoidable impacts to wildlife habitat (see Exhibit G). The RFA 5 Solar Facility is not anticipated to have any significant adverse impacts to soils, wetlands, protected areas, water resources, fish and wildlife habitat and species, threatened and endangered species, scenic and aesthetic resources, and historic, cultural, and archaeological resources.

Socioeconomic

- The RFA 5 Solar Facility will not have significant adverse socioeconomic impacts on scenic, cultural, historical, archeological, or recreational resources. Exhibit L (Public Services) demonstrates that the Solar Facility will not have significant impacts on community services such as housing, sewer, water supply, waste disposal, health care, education, and transportation. The remote location of the Solar Facility renders insignificant any other adverse social consequences, such as noise or visual impacts as discussed in Exhibit O3 and Exhibit I).
- The RFA 5 Solar Facility will provide job opportunities both during construction and operations thus contributing labor wages in the local economy. This is further discussed in Attachment D-2.
    - ***Construction-related economic impacts.*** The Certificate Holder expects that construction of the RFA 5 Solar Facility would extend for 18 months and will directly employ an average of 200 workers on site, with a monthly peak of 550 workers. Construction-related spending on labor and materials would also have indirect economic impacts (e.g., supply-chain impacts generated by expenditures on goods and services supplied by local vendors) and induced economic impacts (e.g., consumption-driven impacts that are generated by the spending of households associated either directly or indirectly with the Solar Facility such as workers purchasing groceries). Overall, RFA 5 Solar Facility construction is estimated to support a total of approximately 463 full-time equivalent jobs and approximately $39 million in labor income, with total economic output of approximately $78 million. This is a significant economic benefit to the local economy even if it will only occur over the 18-month construction period.
    - ***Operations-related economic impacts.*** During the 40-year period of the RFA 5 Solar Facility operations, four full-time employees are anticipated to be employed on-site to operate and maintain the Solar Components, with all of these workers expected to reside in the three-county region, most likely in Sherman County. Indirect impacts from the operational employment and spending are estimated to support approximately two jobs, with induced impacts estimated to support approximately three jobs. Overall, operation of the RFA 5 Solar Facility is estimated to support approximately nine total (direct, indirect, and induced) jobs in the three-county region and approximately $1.5 million in labor income, with total economic output of approximately $5.8 million each year the RFA 5 Solar Facility operates.
- As provided by landowner testimony, the RFA 5 Solar Facility will have no direct impact on existing agricultural-related jobs as no jobs associated with landowner farm operations are anticipated to be lost. The Sherman County community will benefit from the diversification of the job market and the continued support of renewable energy-focused careers as discussed in the Economics Section XIV of the SCCP. Further, general household spending by

landowners involved in RFA 5 is anticipated to remain steady due to no net loss in income as a result of the RFA 5 lease payments.

- The RFA 5 Solar Facility will also contribute significant property tax payments to the County which will support the local economy. Property taxes are one of the most important sources of revenue for the public sector in Oregon, helping to support police, fire protection, education, and other services provided by local taxing districts. A Fiscal Impact Analysis was prepared on behalf of PGE (see Attachment D-3) to estimate local tax revenues that would be expected to accrue over the operating life of the RFA 5 Solar Facility. PGE has not entered into any tax arrangements with Sherman County for the RFA 5 Solar Facility at this time, but intends to negotiate an agreement under the Fee in Lieu of Property Taxes for solar projects program (referred to as the Solar Payment in Lieu of Taxes or Solar PILOT) and these estimates are presented in Attachment D-3. Absent a Solar PILOT or other tax abatement program, PGE would pay taxes under the standard state property tax requirements. Therefore, the RFA 5 Solar Facility would contribute fiscal benefits to the County through its property tax payments regardless of the final tax program the Solar Facility enters into. The fiscal analysis presented in Attachment D-3 is summarized below.
    - The fiscal impact analysis presented in Attachment D-3 estimates potential property tax payments for the Solar PILOT assuming a 15-year extension and a 20-year extension. Total estimated payments to Sherman County would range from approximately $80.5 million (20-year Solar PILOT) to $103.7 million (15-year Solar PILOT) over the assumed 40-year operating life of the Solar Facility proposed under RFA 5.
    - Based on the Tax Code Area 7-2 millage rate, PGE anticipates that Sherman County would receive the largest share (55 percent) of the increased government revenues generated by the RFA 5 Solar Facility. Activities that are financed by general fund revenues in Sherman County include roads, law enforcement, public health, weed control, land use planning, assessment and taxation, district attorney, juvenile services, and general administration.
    - In addition, more than one-third (35 percent) of revenues would be distributed to education via the North Central Educational Service District (13 percent) and the Sherman County School District (22 percent).
    - Other government units that would receive Solar Components-related property tax revenues include the North Central Sherman Rural Fire Protection District, the Sherman County Soil and Water Conservation District, and the Sherman County Health District. Increased funding for the North Central Sherman Rural Fire Protection District could indirectly benefit agricultural activities through the provision of additional funds for wildland firefighting. Similarly, increased funding to the Sherman County Soil and Water Conservation District would help with conservation of natural resources and potentially benefit agricultural activities.

- The Certificate Holder has sited the facility to minimize its socioeconomic impacts on the local agricultural economy by reducing the number of high-value soils impacted compared to the original layout the Certificate Holder considered for RFA 5. The original layout included a solar siting area of 1,789 acres of EFU-zoned land, which included a total of 1,070 acres with high-value soils. The overall footprint of the Solar Siting Area was reduced through engineering refinements, and the Solar Siting Area was modified to avoid some of the nearby tracts that are predominately composed of high-value farmland soils. These modifications resulted in the Solar Siting Area included in this RFA 5 as shown in Figure D-1 that includes a total of 1,244 acres of EFU-zoned land, of which approximately 785 acres comprise high-value soils and 805 acres qualify as high-value farmland based on ORS 195.300(10)(a).
- For the foregoing reasons, including the creation of direct, indirect, and induced employment and economic benefit from construction and operations, contribution to property tax payments that will provide important funding for Sherman County's taxing district, and PGE's voluntary contributions to the community, the Solar Facility as proposed does not impose significant adverse economic consequences but rather would provide net economic benefits to the county.

Energy

- As discussed above, the RFA 5 Solar Facility will support the generation of reliable renewable energy for sale to the public and, while doing so, promote the goals of Sherman County, as well as Oregon's Renewable Portfolio Standard and Clean Energy Targets bill (House Bill 2021). This bill imposes additional requirements for certain electricity providers serving electricity in Oregon to reduce the greenhouse gas emissions associated with the electricity they provide.
- The Solar Components make a strong investment and commitment to rural economic development. As proposed, the Solar Components will provide a reliable source of electricity with no fuel cost and no associated emissions for at least 40 years.
- In addition to Oregon's Renewable Portfolio Standard and clean energy goals, private companies have their own renewable energy procurement policies, which increase the demand for renewable energy in Oregon. These public and private policies are intended to reduce greenhouse gas emissions, mitigate climate impact, and reduce reliance on carbon-based fuels. Solar power generation, like that proposed with the RFA 5 Solar Facility, helps further these public and private policies and outweighs removing approximately 1,244 acres of agricultural land (999 acres of which is considered high-value farmland) for the life of the RFA 5 Solar Facility.

5.6.3 Compatibility with Adjacent Land Uses

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

Uses adjacent to the RFA 5 Solar Facility consist of a mixture of agricultural production and renewable energy facilities. As shown on Figures D-3 and D-4, there are operating renewable energy facilities intermingled with land in active crop cultivation. As discussed in Section 5.4.2, the RFA 5 Solar Facility construction and operation will not limit or negatively impact current or future farm activities and accepted farming practices on the adjacent properties nor will it significantly increase the costs of such practices. Further, landowners involved in the project who also have adjacent farmland in agricultural production have not expressed concerns about farming alongside the Solar Components during its lifetime. Unique to the Solar Components, one of the involved landowners has current experience operating active farmland adjacent to the existing Wy'East solar facility, which is located southeast of the proposed facility. The landowner stated there had been no issues operating their farm next to the solar energy facility and, in fact, benefited from the installation of a new road that provides farm vehicle and equipment east access to a centrally located field.

As provided by Exhibit L, traffic impacts during construction will be mitigated through a construction traffic management plan and impacts during operation will be minimal due to the limited number of operational personnel. The Certificate Holder will communicate with adjacent landowners to minimize and mitigate any traffic impacts to their farming practices during the temporary construction period. As discussed in Exhibit C, the Certificate Holder shall control the introduction and spread of noxious weeds in accordance with the methods, monitoring procedures and success criteria set forth in the draft Comprehensive Solar Revegetation and Soil Management Plan, which is Attachment C-2 to Exhibit C. The plan will be finalized in consultation with the Sherman County Weed Department and will likely include BMPs to prevent the spread of existing noxious weeds and ensure that new populations of species are not accidentally introduced. These BMPs include flagging and treating areas of noxious weed infestations prior to construction, cleaning vehicles and equipment prior to ground disturbance, strategic use of herbicide, mechanical removal and revegetation of disturbed soils. Additional steps may include monitoring areas of disturbance for noxious weeds after construction, training construction and operations staff and limiting vehicle traffic in noxious weed-infested areas. The use of these BMPs during construction and operation will reduce the risk of weed infestation in cultivated land and the associated cost to the farmer for weed control (see Exhibit C). The Certificate Holder will also minimize dust during construction through application of water and other dust control measures as discussed in Exhibit C. Since the Solar Components are not an urbanized use, they do not have urban use characteristics such as traffic, noise, and emissions and will not require urban infrastructure such as water and sewer. Therefore, the Solar Components are compatible with the adjacent land uses.

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

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

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

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

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

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

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

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

There are no applicable federal land management plans. Therefore, these standards do not apply.

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

(c) A materials analysis, including:

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

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

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

The materials analysis for RFA 5 can be found in Section 7.0 of the Exhibit N.

8.0 References

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9.0 Approval Standards and Submittal Requirements

Table D-8. Approval Standards and Submittal Requirements Matrix

Requirements	Location
OAR 345-022-0030 Land Use	–
Approval Standards	
(1) To issue a site certificate, the Council must find that the proposed facility complies with the statewide planning goals adopted by the Land Conservation and Development Commission.	Section 1
(2) The Council shall find that a proposed facility complies with section (1) if:	

Requirements	Location
(a) The applicant elects to obtain local land use approvals under ORS 469.504(1)(a) and the Council finds that the facility has received local land use approval under the acknowledged comprehensive plan and land use regulations of the affected local government; or	Section 4.2
(b) The applicant elects to obtain a Council determination under ORS 469.504(1)(b) and the Council determines that:	Section 5.1
(A) The proposed facility complies with applicable substantive criteria as described in section (3) and the facility complies with any Land Conservation and Development Commission administrative rules and goals and any land use statutes directly applicable to the facility under ORS 197.646(3);	Section 5.1
(B) For a proposed facility that does not comply with one or more of the applicable substantive criteria as described in section (3), the facility otherwise complies with the statewide planning goals or an exception to any applicable statewide planning goal is justified under section (4); or	Sections 5.2 and 5.3
(C) For a proposed facility that the Council decides, under sections (3) or (6), to evaluate against the statewide planning goals, the proposed facility complies with the applicable statewide planning goals or that an exception to any applicable statewide planning goal is justified under section (4).	Sections 5.2 and 5.3
(3) As used in this rule, the "applicable substantive criteria" are criteria from the affected local government's acknowledged comprehensive plan and land use ordinances that are required by the statewide planning goals and that are in effect on the date the applicant submits the application. If the special advisory group recommends applicable substantive criteria, as described under OAR 345-015-0180, the Council shall apply them. If the special advisory group does not recommend applicable substantive criteria, the Council shall decide either to make its own determination of the applicable substantive criteria and apply them or to evaluate the proposed facility against the statewide planning goals.	Sections 5.2 and 5.3
(4) The Council may find goal compliance for a proposed facility that does not otherwise comply with one or more statewide planning goals by taking an exception to the applicable goal. Notwithstanding the requirements of ORS 197.732, the statewide planning goal pertaining to the exception process or any rules of the Land Conservation and Development Commission pertaining to the exception process, the Council may take an exception to a goal if the Council finds:	Section 5.6
(a) The land subject to the exception is physically developed to the extent that the land is no longer available for uses allowed by the applicable goal;	Section 5.6
(b) The land subject to the exception is irrevocably committed as described by the rules of the Land Conservation and Development Commission to uses not allowed by the applicable goal because existing adjacent uses and other relevant factors make uses allowed by the applicable goal impracticable; or	Section 5.6.2
(c) The following standards are met:	–
(A) Reasons justify why the state policy embodied in the applicable goal should not apply;	Section 5.6.1
(B) The significant environmental, economic, social and energy consequences anticipated as a result of the proposed facility have been identified and adverse impacts will be mitigated in accordance with rules of the Council applicable to the siting of the proposed facility; and	Section 5.6.2
(C) The proposed facility is compatible with other adjacent uses or will be made compatible through measures designed to reduce adverse impacts.	Section 5.6.3

Requirements	Location
(5) If the Council finds that applicable substantive local criteria and applicable statutes and state administrative rules would impose conflicting requirements, the Council shall resolve the conflict consistent with the public interest. In resolving the conflict, the Council cannot waive any applicable state statute.	Section 6
(6) If the special advisory group recommends applicable substantive criteria for an energy facility described in ORS 469.300(11)(a)(C) to (E) or for a related or supporting facility that does not pass through more than one local government jurisdiction or more than three zones in any one jurisdiction, the Council shall apply the criteria recommended by the special advisory group. If the special advisory group recommends applicable substantive criteria for an energy facility described in ORS 469.300(11)(a)(C) to (E) or a related or supporting facility that passes through more than one jurisdiction or more than three zones in any one jurisdiction, the Council shall review the recommended criteria and decide whether to evaluate the proposed facility against the applicable substantive criteria recommended by the special advisory group, against the statewide planning goals or against a combination of the applicable substantive criteria and statewide planning goals. In making the decision, the Council shall consult with the special advisory group, and shall consider:	Sections 5.2 and 5.3
(a) The number of jurisdictions and zones in question;	Sections 5.2 and 5.3
(b) The degree to which the applicable substantive criteria reflect local government consideration of energy facilities in the planning process; and	Sections 5.2 and 5.3
(c) The level of consistency of the applicable substantive criteria from the various zones and jurisdictions.	Sections 5.2 and 5.3
Submittal Requirements	
(7) To assist the Council in determining whether the standard outlined in (1) through (6) has been met, the Applicant must submit:	–
(a) Information about the proposed facility's compliance with the statewide planning goals adopted by the Land Conservation and Development Commission, providing evidence to support a finding by the Council as required by OAR 345-022-0030.	Section 2.0
(b) The applicant must state whether the applicant elects to address the Council's land use standard by obtaining local land use approvals under ORS 469.504(1)(a) or by obtaining a Council determination under ORS 469.504(1)(b). An applicant may elect different processes for an energy facility and a related or supporting facility but may not otherwise combine the two processes. Once the applicant has made an election, the applicant may not amend the application to make a different election. In this subsection, "affected local government" means a local government that has land use jurisdiction over any part of the proposed site of the facility. In the application, the applicant must:	Section 4.0
(A) Include a map showing the comprehensive plan designations and land use zones in the analysis area;	Section 4.1 and Figure D-1
(B) If the applicant elects to obtain local land use approvals:	Section 4.2
(i) Identify the affected local governments from which land use approvals will be sought;	Section 4.2
(ii) Describe the land use approvals required in order to satisfy the Council's land use standard;	Section 4.2
(iii) Describe the status of the applicant's application for each land use approval; and	Section 4.2
(iv) Provide an estimate of time for issuance of local land use approvals.	Section 4.2

Requirements	Location
(C) If the applicant elects to obtain a Council determination on land use:	Section 5.1
(i) Identify the affected local governments;	Section 5.1
(ii) Identify the applicable substantive criteria from the affected local government's acknowledged comprehensive plan and land use regulations that are required by the statewide planning goals and that are in effect on the date the application is submitted and describe how the proposed facility complies with those criteria;	Sections 5.2 and 5.3
(iii) Identify all Land Conservation and Development Commission administrative rules, statewide planning goals and land use statutes directly applicable to the facility under ORS 197.646(3) and describe how the proposed facility complies with those rules, goals and statutes;	Section 5.4
(iv) If the proposed facility might not comply with all applicable substantive criteria, identify the applicable statewide planning goals and describe how the proposed facility complies with those goals; and	Section 5.5
(v) If the proposed facility might not comply with all applicable substantive criteria or applicable statewide planning goals, describe why an exception to any applicable statewide planning goal is justified, providing evidence to support all findings by the Council required under ORS 469.504(2).	Section 5.6
(D) If the proposed facility will be located on federal land:	Section 6.0
(i) Identify the applicable land management plan adopted by the federal agency with jurisdiction over the federal land;	Section 6.0
(ii) Explain any differences between state or local land use requirements and federal land management requirements;	Section 6.0
(iii) Describe how the proposed facility complies with the applicable federal land management plan;	Section 6.0
(iv) Describe any federal land use approvals required for the proposed facility and the status of application for each required federal land use approval;	Section 6.0
(v) Provide an estimate of time for issuance of federal land use approvals; and	Section 6.0
(vi) If federal law or the land management plan conflicts with any applicable state or local land use requirements, explain the differences in the conflicting requirements, state whether the applicant requests Council waiver of the land use standard described under paragraph (B) or (C) of this subsection and explain the basis for a waiver.	Section 6.0
(c) A materials analysis, including:	Section 7.0 of Exhibit N
(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;	Section 7.1 of Exhibit N
(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and	Section 7.2 of Exhibit N
(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.	Section 7.3 of Exhibit N

Figures

Biglow Canyon Wind Farm Request for Amendment #5

Figure D-1
Land Use Analysis Area

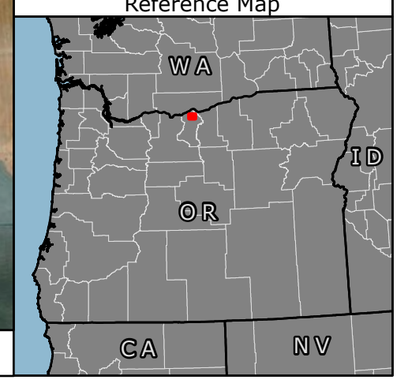
SHERMAN COUNTY, OR

- RFA5 Site Boundary
- Land Use Analysis Area (.5 mile Buffer)
- Surrounding Lands Analysis Area (.5 mile Buffer from Solar Siting Area)
- Solar Siting Area
- Transmission Corridor
- City/Town

TETRA TECH

PGE

Reference Map



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WGS 1984 UTM Zone 10N

0 1 2 Miles

NOT FOR CONSTRUCTION

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Biglow Canyon Wind Farm Request for Amendment #5

Figure D-2 Zoning and Comprehensive Plan Designations

SHERMAN COUNTY, OR

- RFA5 Site Boundary
- Land Use Analysis Area (.5 mile Buffer)
- Surrounding Lands Analysis Area (.5 mile Buffer from Solar Siting Area)
- Solar Siting Area
- Transmission Corridor
- City/Town

Sherman County Zoning

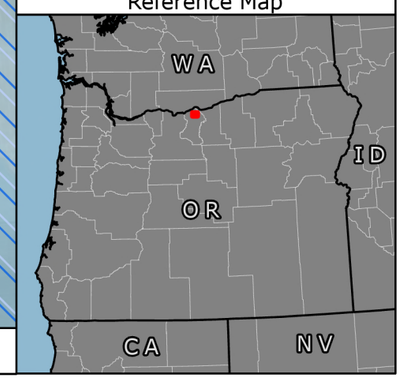
- Agricultural/Airport (A-1)
- Exclusive Farm Use (F-1)
- Incorporated Town

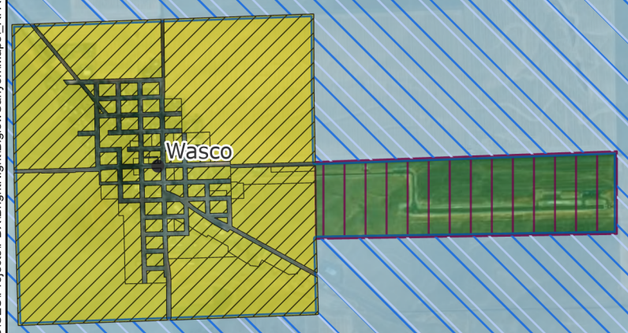
Comprehensive Plan Designations

- Industrial
- Cropland
- Residential

TETRA TECH PGE

Reference Map





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Biglow Canyon Wind Farm Request for Amendment #5

Figure D-3
Tracts and Adjacent Facilities

SHERMAN COUNTY, OR

RFA5 Site Boundary
Land Use Analysis Area (.5 mile Buffer)
Solar Siting Area
City/Town

Tract Number
1
2
3
4

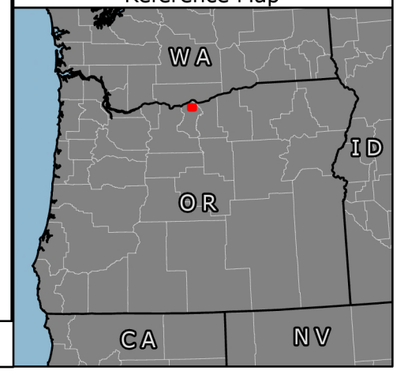
Existing Biglow Canyon Substation
Klondike Substation
PuTu Substation
Wyeast Solar Facility
PaTu Wind Farm

Existing Transmission Lines
Under 100 kV
101 - 230 kV

Oregon Energy Facility Council Facilities
Biglow Canyon Wind Farm, Operating
Klondike III Wind Project, Operating

TETRA TECH
PGE

Reference Map



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Biglow Canyon Wind Farm Request for Amendment #5

Figure D-4
Existing Land Use

SHERMAN COUNTY, OR

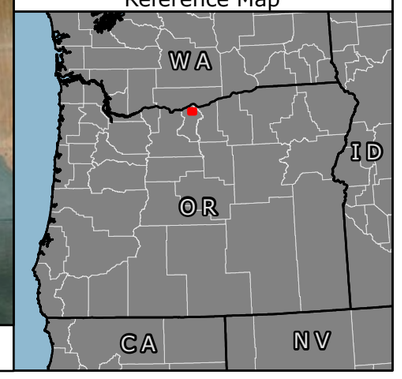
RFA5 Site Boundary
Analysis Area (.5 mile Buffer)
Solar Siting Area
Tract Boundary
City/Town

Existing Land Use
Non-Cultivated
Cultivated

TETRA TECH

PGE

Reference Map



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WGS 1984 UTM Zone 10N

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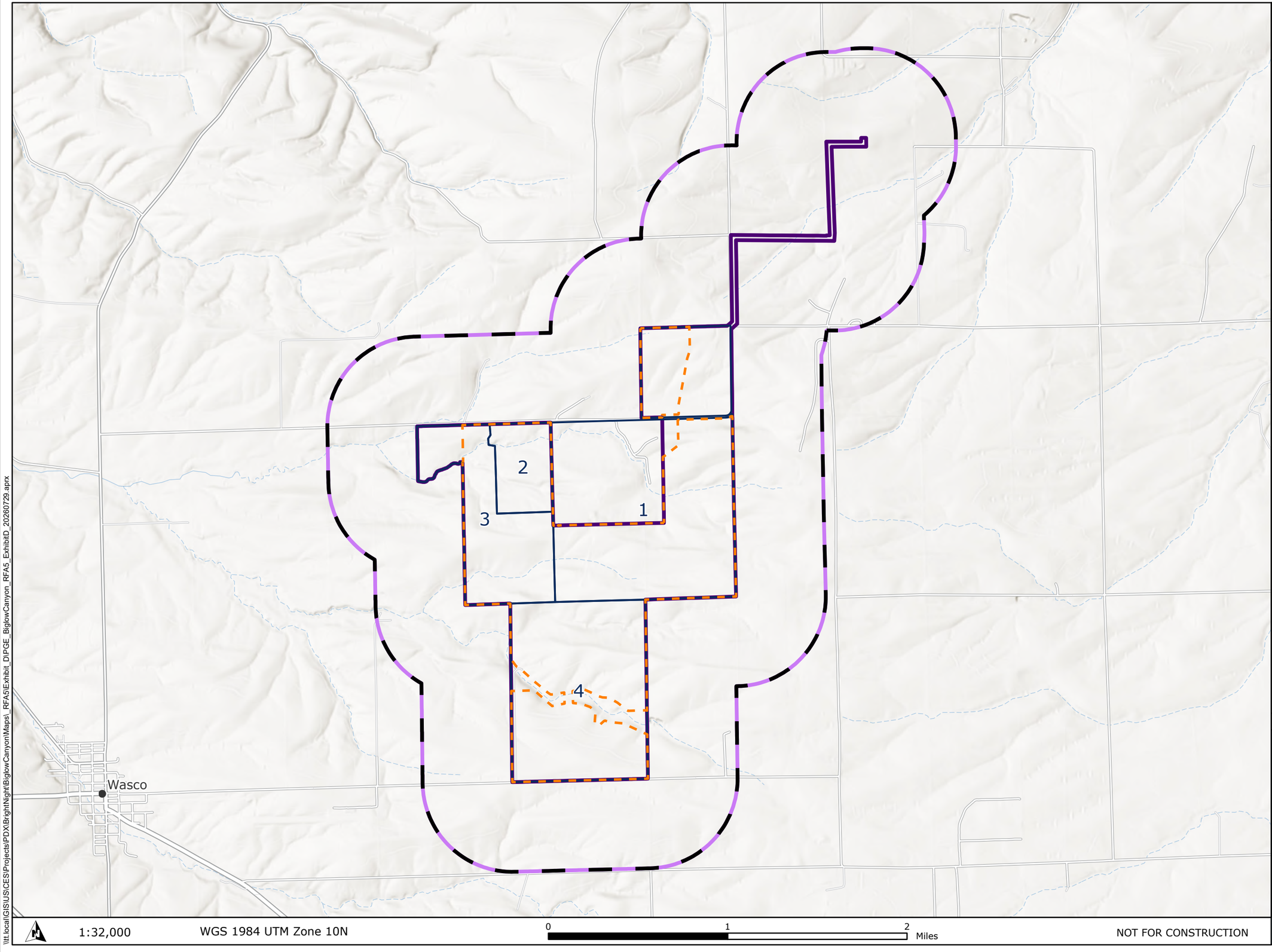
Biglow Canyon Wind Farm Request for Amendment #5

Figure D-5
Water Rights

SHERMAN COUNTY, OR

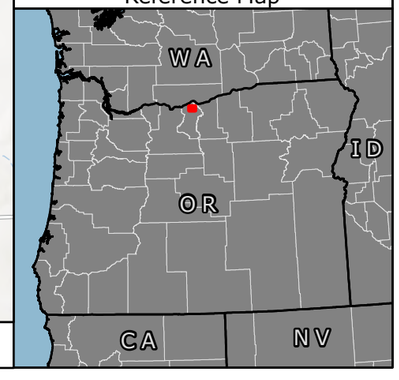


- RFA5 Site Boundary
- Land Use Analysis Area (.5 mile Buffer)
- Solar Siting Area
- Tract Boundary
- City/Town

TETRA TECH

PGE

Reference Map



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Biglow Canyon Wind Farm Request for Amendment #5

Figure D-6 NRCS Soil Capability Classifications

SHERMAN COUNTY, OR

- RFA5 Site Boundary
- Analysis Area (.5 mile Buffer)
- Solar Siting Area
- Tract Boundary
- City/Town

Soil Capability Class

- Class II
- Class III
- Class IV
- Class VII

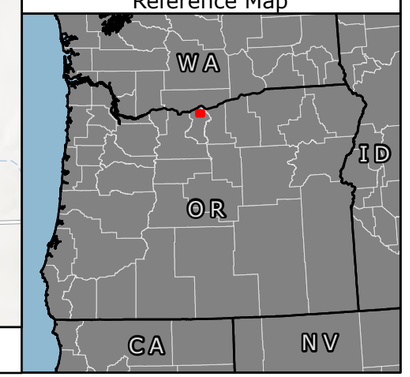
1
2
3
4

Wasco

TETRA TECH

PGE

Reference Map



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Biglow Canyon Wind Farm Request for Amendment #5

Figure D-7
High Value Farmland

SHERMAN COUNTY, OR

- RFA5 Site Boundary
- Land Use Analysis Area (.5 mile Buffer)
- Solar Siting Area
- Tract Boundary
- City/Town
- HVF Per ORS 195.300(10)(f) - AVA
- HVF per ORS 195.300(10)(a) - soils

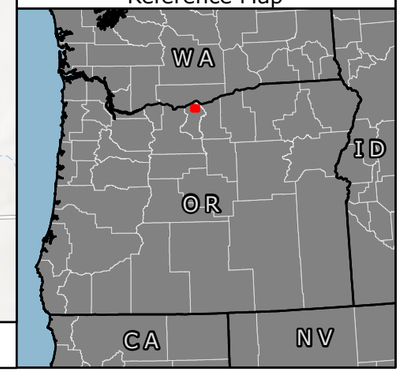
1
2
3
4

Wasco

TETRA TECH

PGE

Reference Map



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WGS 1984 UTM Zone 10N

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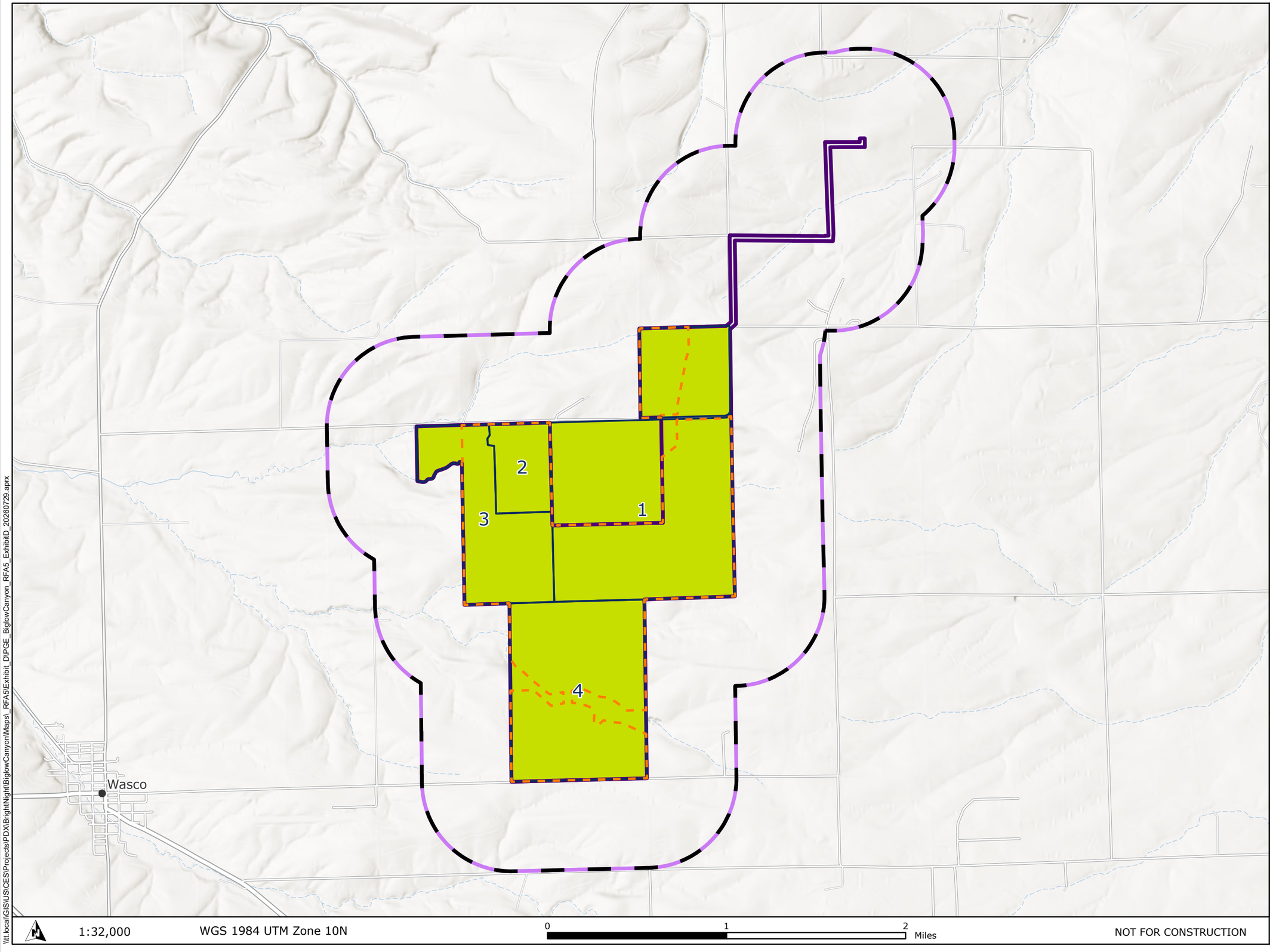
Biglow Canyon Wind Farm Request for Amendment #5

Figure D-8
Arable and Non-Arable Soils

SHERMAN COUNTY, OR

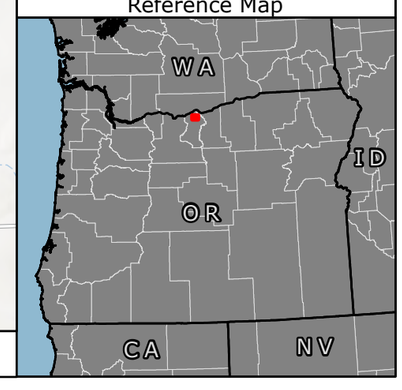


- RFA5 Site Boundary
- Land Use Analysis Area (.5 mile Buffer)
- Solar Siting Area
- Tract Boundary
- City/Town
- Arable Land

TETRA TECH

PGE

Reference Map



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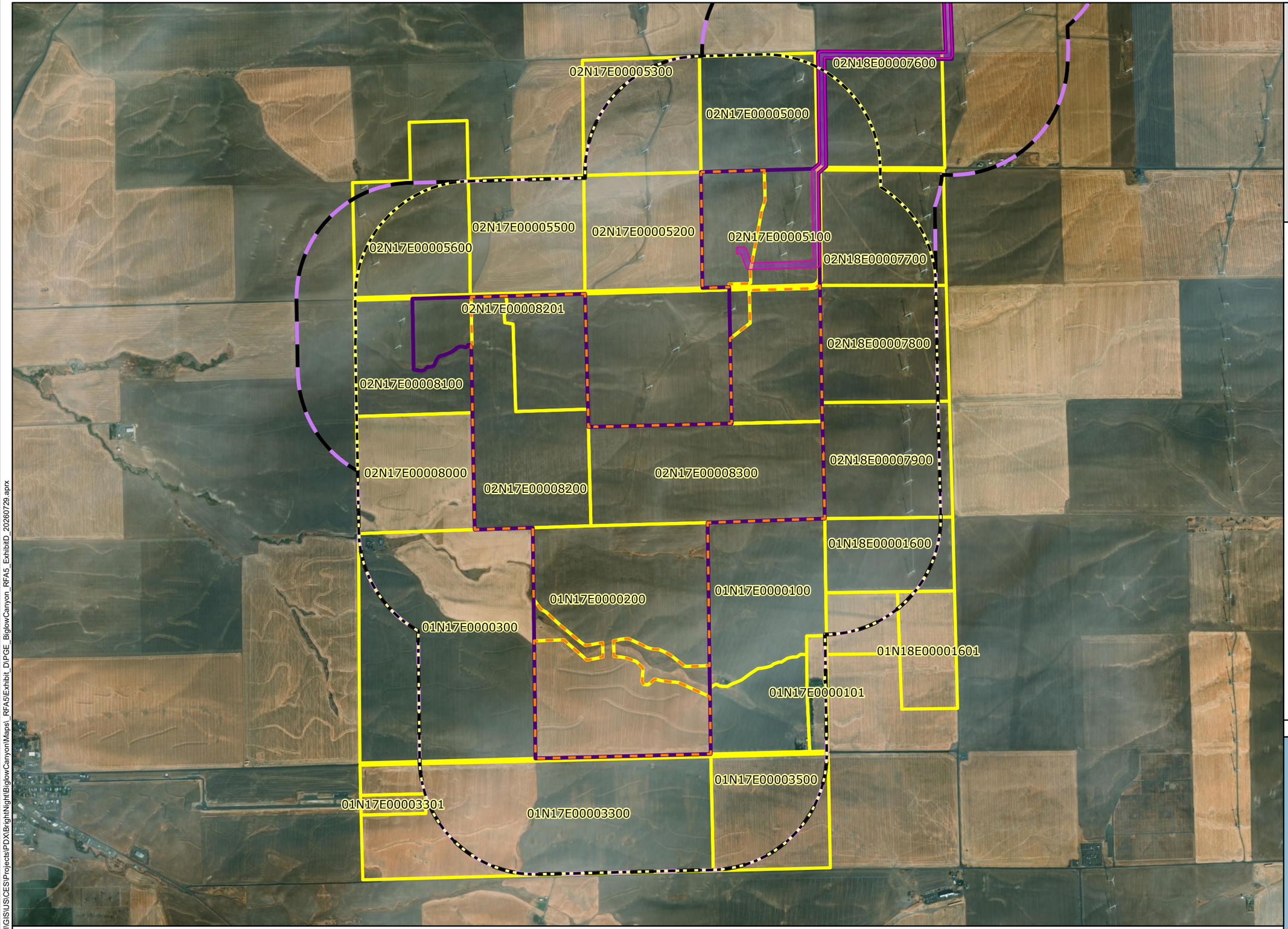
Biglow Canyon Wind Farm Request for Amendment #5

Figure D-9
Surrounding Lands

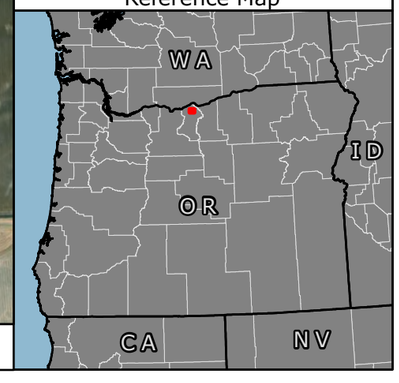
SHERMAN COUNTY, OR



RFA5 Site Boundary
Land Use Analysis Area (.5 mile Buffer)
Solar Siting Area
City/Town
Surrounding Lands Analysis Area (.5 mile Buffer from Solar Siting Area)
Transmission Corridor
Taxlot Boundary

TETRA TECH
PGE

Reference Map



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Biglow Canyon Wind Farm Request for Amendment #5

Figure D-10
One-Mile Study Area

SHERMAN COUNTY, OR

- RFA5 Site Boundary
- Solar Siting Area
- City/Town
- One-Mile Study Area

Oregon Energy Facility Siting Council Facilities

- Biglow Canyon Wind Farm, Operating
- Biglow Solar Micrositing Area, Approved
- Klondike III Wind Project, Operating

Existing Transmission Lines

- Under 100 kV
- 101 - 230 kV

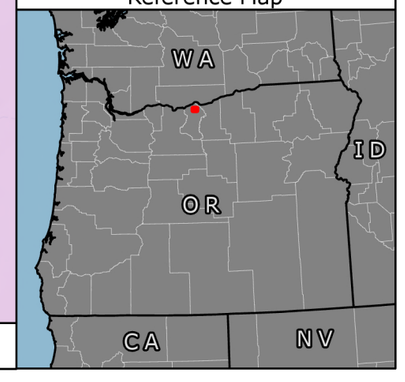
Sherman County Zoning

- Agricultural/Airport (A-1)
- Exclusive Farm Use (F-1)
- Incorporated Town

TETRA TECH

PGE

Reference Map



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WGS 1984 UTM Zone 10N

0 1 2 Miles

NOT FOR CONSTRUCTION

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Attachment D-1. Landowner Surveys

Responses provided below were verified by landowner on January 28, 2025; no redactions requested.

GRAY BRETT L GRAY TRENA D
PO BOX 325
WASCO, OR 97065

Tract 1 (tax lots: 02N17E00005100 and 02N17E00008300) – owns
Tract 2 (tax lots: 01N17E0000100, 01N18E00001600, 01N18E00007900) – contract farms

Re: Biglow Solar Landowner Survey

Dear Mr. and Mrs. Gray,

Thank you for your initial responses to this survey/questionnaire and responses to follow-up emails. The purpose of these questions is to understand the current agricultural practices on the Exclusive Farm Use (EFU) zoned lands within the Biglow Solar Project (Project) Site Boundary and the economic implications of removing those lands from agricultural use during the construction and operational period of the project. This information is needed to support the Project's permitting process under the Oregon Energy Facility Siting Council (EFSC), specifically the request for an exception to the agricultural land protections under Oregon's Statewide Planning Goal 3 – or what is known as a "Goal 3 exception." As more solar energy projects are proposed on EFU land in the state, EFSC has been reviewing Goal 3 exception requests in more detail and has required applicants provide information from the property owners/farmers to accurately assess the possible impacts of removing these lands from agricultural use.

In the below sections, your responses to the original survey plus follow-up questions have been captured in blue text. If you feel any of the information provided is confidential, please indicate what sections of the questionnaire you would like us to redact from public review.

We appreciate your assistance. Your perspective and knowledge of these lands is invaluable.

Current Farmland Practices

1. What is your name and how are you associated with tax lots: 02N17E00005100 and 02N17E00008300?
   Response: Brett L Gray & Trena D Gray, Owners

2. How many acres of land do you farm within Sherman County (including lands within and outside of the leased Project area)?

   Response:

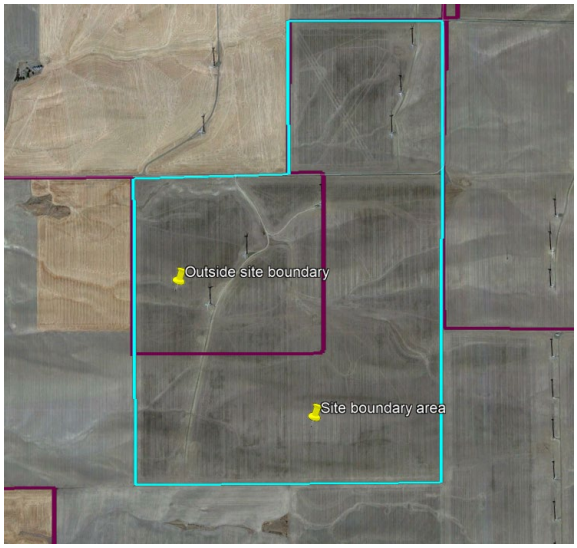
   a. We farm a total of 3,422 acres, which is a combination of acres we own and acres we contract farm:
      i. We own a total of 2,522 acres, but 100 acres are scab land or part of homestead so not cultivated. We cultivate a total of 2,422 acres owned by the Gray family.
         1. Of these 2,422 cultivated acres, approximately 580 acres are leased to the solar project (Tract 1).

2. Plan is to continue farm (or lease out to farm) the remaining farm acreage outside the solar fence area.

ii. We also custom farm 1,000 acres owned by Hilderbrand Trust (part of Tract 2).

1. Custom farming is where the landowner pays for all the inputs and pays the farmer on a per acre basis. Hilderbrand trust essentially pays us for labor and equipment to farm the 1,000 acres (500 acres each year).

3. With regard to Tract 1 (tax lots: 02N17E00005100 and 02N17E00008300), approximately 580 acres are located within the Project site boundary and 259 acres are located outside the Project site boundary. Do you plan to continue farming the 259 acres located outside the site boundary? See the image below which shows the Tract boundary in blue and the site boundary in purple.
Response: Yes



4. We understand that you custom farm a portion of Tract 2 (three tax lots: 01N17E0000100, 01N18E00001600, 01N18E00007900 owned by Hilderbrand John O Trust). Tract 2 includes 491 acres, all of which is in the solar site boundary (see screen shot below). Do you farm all 491 acres of this tract? If a portion of the tract near the existing wind turbines were left outside the solar fence line, would you anticipate farming those acres?
Response: Yes, we would continue to farm anything outside solar fence.

5. Based on the above information, the proposed reduction of dryland wheat farmland from your current operations include approximately 580 acres associated with Tract 1, 491 acres associated with Tract 2 for a total of 1,071 acres or 31.3 percent of your total farmland you currently cultivate in Sherman County. Is this an accurate summary?
   Response: Yes

6. Are you aware of any fallow agricultural land (e.g. CRP lands or other fallow lands) in Sherman County that you either own or could lease and develop into cultivated wheat crops to replace some or all of the acres of wheat lands you will no longer farm because of the solar facility?
   Response: As far as taking CRP out, its not economically feasible that's the reason it's in CRP now. But I'm not interested in more land at this stage of my life. The competition for land is very high, the bigger farms just keep getting bigger.

7. Describe current crop and cultivation and/or ranching practices in the leased area and on your other Sherman County lands in agricultural production (i.e., total acres of land used for dryland crops, types of dryland crops, irrigated agriculture, cattle ranching, or other agricultural use):

   Response: Dry land Wheat crop every other year. So in a given year, only half of our farmland is planted with wheat. August 2023-October 2024 We chemfallow spraying. October 2024 Fertilize & Seed, April spray Wheat for weeds, Harvest July 2025. Approximately 1,250 acers a year cultivated of the 2,422 acres we own/farm for wheat.

8. Please provide details about crop schedule within the leased area (i.e., when do you till, seed, fertilize, and/or spray, and when do you harvest?): **Response:** look at question 7.

9. What details can you provide regarding crop yields on your parcel(s) over the past 5-10 years (e.g., annual average yield per acre over past 5-10 years)? **Response:** 10 year av. is 61 bu/ac

10. There is another parcel in the project area – the McCoy's property (Tract 4) – adjacent to/south of your land – farmed by Bryce. Would you say it is reasonable to assume similar yields are occurring on that property?

    Response: Probably- reasonable – may be a little less. Not a lot of change one way or another.

11. What entity do you sell your wheat to? (i.e., Mid Columbia Producers, etc.)?
    Response: Yes, Mid Columbia Producers

12. What are typical expenditures associated with the agricultural practices on your land (e.g., seed, fertilizer, chemicals, fuel, etc.)? Who do you purchase these materials from (e.g., Wasco Farm Store, etc.)? And can you provide annual estimates for each expenditure or average dollar per acre in expenses?
    Response: Six year average per acre, fuel $21 Ed staub, Klamath falls, Fertilizer $17 morrow county grain growers (plus bio solids see note below), Chemical $91 Mcgregor, seed $27 Mid Columbia Producers, repairs $42 Morrow county grain growers and RDO Equipment.

We use bio-solids for fertilizer we obtain from Tualatin Valley's Clean Water Services which keeps fertilizer costs down.
Harvest and equipment $50.

To help standardize this information across farms, the following table has been created with your initial responses added. Please add or correct the information and add extra lines or information, as needed.

Harvest Year	$/Acre	Vendor (Name/Location)
Seed	**$27**	Mid Columbia Producers, Sherman County
Fertilizer	**$17**	Morrow County Grain Growers (Morrow County)
Biosolids		Clean Water Services
Chemicals	**$91**	McGregor (Wasco, OR) (Bought out Sherman Farm Chemical – others may use MCGG)
Fuel, lube	**$21**	Ed Staub, Klamath Falls (Bought Fuel Dept of Mid Columbia Producers – have a few local folks in Wasco)
Repairs	**$47**	Morrow County Grain Growers and RDO Equipment (Wasco, OR) MCGG has a Wasco office. RDO is a John Deer dealer with stores in Pasco, Pendleton, Hermiston. Some local employees in Wasco.
Other variable expenses (specify)	**$50**	

The costs are based on the average per year, includes fallow and growing. Venders are the same.
The costs are based on my owned acers 2,422.

13. How many direct jobs are currently supported by operations where the Project would be located, and would any be eliminated if the Project is built?
Response: We are a two person operation, and we will keep farming the remaining acres.

14. Would jobs for your agricultural operations elsewhere be impacted or supported by implementation of the project? If yes, how? **Response:** No

15. To what extent, if any, do you anticipate reducing current spending on labor, supplies, and services for agricultural operations due to implementation of the Project?
Response: Expenses will decrease on a per acre base. Income will increase so I anticipate spending more per acre on remaining farm.

Compatibility With Adjacent Farmlands

16. Do you currently have Biglow Wind turbines on your land and if so, are you able to farm near the wind turbines?
Response: Yes and yes it has changed how we farm some fields, but not good or bad just different. We would do it again.

How has the construction activities or traffic from routine operations at the wind farm impacted your farming practices?
Response: Not a big impact, just different sharing the land with someone else

17. With the implementation of the Biglow Solar Project, would you continue to farm/ranch lands adjacent to the solar array areas or elsewhere throughout the local area? If yes, would the Project potentially impact farming practices outside of where solar facilities would be located? If yes, how?
Response: Yes we will continue farming. I dont think so
18. Do you have suggestions for how the Biglow Solar Project can aid your continued agricultural production?
Response: Laying the project out in such a way that we can utilize as many acres for farming as possible

19. How would you expect your agricultural operations to be impacted by construction of the Biglow Solar Project (i.e., dust, traffic)?
Response: We will have to work together, so everyone gets there work done. i would think the solar project will mediate the dust during construction then plant some grass. Communication is key between the Project and the landowners

20. Do you have any information regarding farm practices on neighboring properties and would you anticipate any impact to those practices due to implementation of the Project?
Response: The neighboring properties farm the same way I do! After construction phase no impact, during traffic will impact them some

Soil and Water Rights

21. Based on your assessment, describe the soil conditions on your parcel(s):
Response: Sandy loam with some organic matter

22. Does the leased land currently have water rights? No.

23. Can you confirm for how many years the leased property has not had an associated water right, and if there are known limitations to obtaining a new water right?

Response: 60 years at least as a residential well.

24. Is there any current consideration or attempt to cancel a water right or transfer a water right to or from the leased land proposed for Project use? **Response:** No

25. In your estimation, how much water do you think you would need to be reasonably certain you could make more productive agricultural use of your land and justify the necessary capital investment in irrigation infrastructure?
Response: No real experience, the irrigation wells in this area are around 1000 feet deep! The only new one in the last 20 years that I know was drilled by PGE for construction off wind farm then

transferred back to land owner. Another one was drilled to keep an existing irrigation project going, they had all the other infrastructure in place.

Responses provided below were verified by landowner on January 15, 2025

McCoy Land, a partnership
1000 VEY WAY APT 363
THE DALLES, OR 97058

Tract 4 (tax lot: 01N17E0000200) – owns

Re: Biglow Solar Landowner Survey

Dear Mr. McCoy,

Thank you for your initial responses to this survey/questionnaire and responses to follow-up emails. The purpose of these questions is to understand the current agricultural practices on the Exclusive Farm Use (EFU) zoned lands within the Biglow Solar Project (Project) Site Boundary and the economic implications of removing those lands from agricultural use during the construction and operational period of the project. This information is needed to support the Project's permitting process under the Oregon Energy Facility Siting Council (EFSC), specifically the request for an exception to the agricultural land protections under Oregon's Statewide Planning Goal 3 – or what is known as a "Goal 3 exception." As more solar energy projects are proposed on EFU land in the state, EFSC has been reviewing Goal 3 exception requests in more detail and has required applicants provide information from the property owners/farmers to accurately assess the possible impacts of removing these lands from agricultural use.

In the below sections, your responses to the original survey plus follow-up questions have been captured in blue text. If you feel any of the information provided is confidential, please indicate what sections of the questionnaire you would like us to redact from public review.

We appreciate your assistance. Your perspective and knowledge of these lands is invaluable.

Current Farmland Practices

1. What is your name and how are you associated with (tax lots; 01N17E0000200)?
   Response: My name is Tom McCoy. I am managing partner of McCoy land. McCoy Land owns the property.

2. How many acres of land do you farm within Sherman County (including lands within and outside of the leased Project area)?
   Response: We own 1,690.3 acres of cropland in Sherman County.

3. Describe current crop and cultivation and/or ranching practices in the leased area and on your other Sherman County lands in agricultural production (i.e., total acres of land used for dryland crops, types of dryland crops, irrigated agriculture, cattle ranching, or other agricultural use):

   Response: We grow soft white wheat and very occasionally spring barley. None of our acres is irrigated or used for other agricultural purposes.

4. Please provide details about crop schedule within the leased area (i.e., when do you till, seed, fertilize, and/or spray, and when do you harvest?):

Response: We follow the summerfallow method of farming often used in low rainfall areas. We grow a wheat crop on approximately half the cropland each year and alternate the areas planted. We currently are not tilling the land and are controlling the weeds with chemical pesticides. On the land planted to wheat, we usually seed and fertilize in October or November, spray the crop the following spring, and harvest in July. The land not planted to a crop is sprayed multiple time as needed to control weeds.

5. What details can you provide regarding crop yields on your parcel(s) over the past 5-10 years (e.g., annual average yield per acre over past 5-10 years)? **Response:** The average yield is approximately 55 bushels of wheat per acre.

6. What entity do you sell your wheat to? (i.e., Mid Columbia Producers, etc.)? **Response:** Mid Columbia Producers

7. What are typical expenditures associated with the agricultural practices on your land (e.g., seed, fertilizer, chemicals, fuel, etc.)? Who do you purchase these materials from (e.g., Wasco Farm Store, etc.)? And can you provide annual estimates for each expenditure or average dollar per acre in expenses? **Response:** We lease our land to a tenant who pays all the expenses except for part of the fertilizer expense. (see question 10)

8. How many direct jobs are currently supported by operations where the Project would be located, and would any be eliminated if the Project is built? **Response:** The land on which the project would be located is a small part of the land our tenant farms. It is unlikely the project would affect jobs.

9. Would jobs for your agricultural operations elsewhere be impacted or supported by implementation of the project? If yes, how? **Response:** No

10. To what extent, if any, do you anticipate reducing current spending on labor, supplies, and services for agricultural operations due to implementation of the Project? **Response:** We lease our cropland using a crop share lease. If all the leased area is covered with solar panels our annual fertilizer expenses would decline by approximately $5,000.

Compatibility With Adjacent Farmlands

11. Do you currently have Biglow Wind turbines on your land and if so, are you able to farm near the wind turbines? **Response:** No

    How has the construction activities or traffic from routine operations at the wind farm impacted your farming practices?

12. With the implementation of the Biglow Solar Project, would you continue to farm/ranch lands adjacent to the solar array areas or elsewhere throughout the local area? If yes, would the Project potentially impact farming practices outside of where solar facilities would be located? If yes, how? **Response:** Yes. Farm practices would remain the same outside the solar array area.

13. Do you have suggestions for how the Biglow Solar Project can aid your continued agricultural production? **Response:** No.

14. How would you expect your agricultural operations to be impacted by construction of the Biglow Solar Project (i.e., dust, traffic)?
Response: We would no longer be able to farm the areas covered by the solar panels.

15. Do you have any information regarding farm practices on neighboring properties and would you anticipate any impact to those practices due to implementation of the Project? **Response:** No.

Soil and Water Rights

16. Based on your assessment, describe the soil conditions on your parcel(s):
Response: Most our soil is good for wheat production.

17. Does the leased land currently have water rights?

    Response: Our property has never had a water right.

    What steps, if any, have you taken to establish a water right? None.

18. Is there any current consideration or attempt to cancel a water right or transfer a water right to or from the leased land proposed for Project use? **Response:** No.

19. In your estimation, how much water do you think you would need to be reasonably certain you could make more productive agricultural use of your land and justify the necessary capital investment in irrigation infrastructure? **Response:** I know of no way of irrigating the property that would be profitable.

Responses provided below were verified by landowner on January 22, 2025; no redactions requested.

CAMPBELL STEPHEN FARM & CABIN TRUST
17816 NE Homestead Dr
Brush Prairie, WA 98606

Tract 5 (tax lot: 02N17E00008201) – owns

Re: Biglow Solar Landowner Survey

Dear Mr. Campbell,

Thank you for your responses to this survey/questionnaire and responses to follow-up emails. The purpose of these questions is to understand the current agricultural practices on the Exclusive Farm Use (EFU) zoned lands within the Biglow Solar Project (Project) Site Boundary and the economic implications of removing those lands from agricultural use during the construction and operational period of the project. This information is needed to support the Project's permitting process under the Oregon Energy Facility Siting Council (EFSC), specifically the request for an exception to the agricultural land protections under Oregon's Statewide Planning Goal 3 – or what is known as a "Goal 3 exception." As more solar energy projects are proposed on EFU land in the state, EFSC has been reviewing Goal 3 exception requests in more detail and has required applicants provide information from the property owners/farmers to accurately assess the possible impacts of removing these lands from agricultural use.

In the below sections, your responses to the original survey has been captured in blue text. If you feel any of the information provided is confidential, please indicate what sections of the questionnaire you would like us to redact from public review.

We appreciate your assistance. Your perspective and knowledge of these lands is invaluable.

Current Farmland Practices

1. What is your name and how are you associated with (tax lots; 02N17E00008201)?
   Response: Stephen R. Campbell. Trustee for the Farm & Cabin Trust

2. How many acres of land do you farm within Sherman County (including lands within and outside of the leased Project area)? **Response:** own 935

3. Describe current crop and cultivation and/or ranching practices in the leased area and on your other Sherman County lands in agricultural production (i.e., total acres of land used for dryland crops, types of dryland crops, irrigated agriculture, cattle ranching, or other agricultural use):
   Response: All acreage is leased to Simpson Ranch Inc.

4. Please provide details about crop schedule within the leased area (i.e., when do you till, seed, fertilize, and/or spray, and when do you harvest?):
   Response: Please contact Grant Simpson (Simpson Ranch) to obtain this information.

5. What details can you provide regarding crop yields on your parcel(s) over the past 5-10 years (e.g., annual average yield per acre over past 5-10 years)?
   *

6. What entity do you sell your wheat to? (i.e., Mid Columbia Producers, etc.)? **Response:** Mid Columbia Producers

7. What are typical expenditures associated with the agricultural practices on your land (e.g., seed, fertilizer, chemicals, fuel, etc.)? Who do you purchase these materials from (e.g., Wasco Farm Store, etc.)? And can you provide annual estimates for each expenditure or average dollar per acre in expenses?
   *
8. What details can you provide regarding historic agricultural revenues on your parcel(s) over the past 5-10 years (e.g., annual revenues from agricultural production)?
   *
9. How many direct jobs are currently supported by operations where the Project would be located, and would any be eliminated if the Project is built?
   *
10. Would jobs for your agricultural operations elsewhere be impacted or supported by implementation of the project? If yes, how?
    *
11. To what extent, if any, do you anticipate reducing current spending on labor, supplies, and services for agricultural operations due to implementation of the Project?
    *

Compatibility With Adjacent Farmlands

12. Do you currently have Biglow Wind turbines on your land and if so, are you able to farm near the wind turbines? **Response:** No Turbines.

    How has the construction activities or traffic from routine operations at the wind farm impacted your farming practices? **Response:** N/A

13. With the implementation of the Biglow Solar Project, would you continue to farm/ranch lands adjacent to the solar array areas or elsewhere throughout the local area? If yes, would the Project potentially impact farming practices outside of where solar facilities would be located? If yes, how?
    *

14. Do you have suggestions for how the Biglow Solar Project can aid your continued agricultural production?
    *

15. How would you expect your agricultural operations to be impacted by construction of the Biglow Solar Project (i.e., dust, traffic)?
    *

16. Do you have any information regarding farm practices on neighboring properties and would you anticipate any impact to those practices due to implementation of the Project?
    *

Soil and Water Rights

17. Based on your assessment, describe the soil conditions on your parcel(s):

18. Does the leased land currently have water rights? **Response:** Not that I'm aware of

19. Is there any current consideration or attempt to cancel a water right or transfer a water right to or from the leased land proposed for Project use? **Response:** No

20. In your estimation, how much water do you think you would need to be reasonably certain you could make more productive agricultural use of your land and justify the necessary capital investment in irrigation infrastructure?
    *

Responses provided below were verified by landowner on January 16, 2025

SIMPSON RICHARD SIMPSON NANCY
PO BOX 370
MORO OR 97039

SIMPSON RANCH

Tract 6 (tax lot: 02N17E00008200) – owned by Richard and Nancy Simpson (farmed by Simpson Ranch)
Tract 5 (tax lot: 02N17E00008201) – leased from Stphen Campbell Trust (farmed by Simpson Ranch)

Re: Biglow Solar Landowner Survey

Dear Mr. Simpson,

Thank you for your responses to this survey/questionnaire and responses to follow-up emails. The purpose of these questions is to understand the current agricultural practices on the Exclusive Farm Use (EFU) zoned lands within the Biglow Solar Project (Project) Site Boundary and the economic implications of removing those lands from agricultural use during the construction and operational period of the project. This information is needed to support the Project's permitting process under the Oregon Energy Facility Siting Council (EFSC), specifically the request for an exception to the agricultural land protections under Oregon's Statewide Planning Goal 3 – or what is known as a "Goal 3 exception." As more solar energy projects are proposed on EFU land in the state, EFSC has been reviewing Goal 3 exception requests in more detail and has required applicants provide information from the property owners/farmers to accurately assess the possible impacts of removing these lands from agricultural use.

In the below sections, your responses to the original survey plus follow-up questions have been captured in blue text. If you feel any of the information provided is confidential, please indicate what sections of the questionnaire you would like us to redact from public review.

We appreciate your assistance. Your perspective and knowledge of these lands is invaluable.

Current Farmland Practices

1. What is your name and how are you associated with (tax lots; 02N17E00008200)?
   Response: Richard and Nancy Simpson (Landowners of Tract 6) and Grant Simpson, Simpson Ranch (farmer, son to Richard and Nancy)

2. How many acres of land do you farm within Sherman County (including lands within and outside of the leased Project area)?
   Response: CONFIDENTIAL

3. Describe current crop and cultivation and/or ranching practices in the leased area and on your other Sherman County lands in agricultural production (i.e., total acres of land used for dryland crops, types of dryland crops, irrigated agriculture, cattle ranching, or other agricultural use):
   Leased Area: **Response:** Dryland wheat farming.
   All other lands in agricultural production: **Response:** Dryland wheat farming.

4. Please provide details about crop schedule within the leased area (i.e., when do you till, seed, fertilize, and/or spray, and when do you harvest?):
   Response: Every other year crop rotation. Next harvest in 2025.

5. What details can you provide regarding crop yields on your parcel(s) over the past 5-10 years (e.g., annual average yield per acre over past 5-10 years)?
   Response: 60 Bushel Per Acre (10 year average)

6. What entity do you sell your wheat to? (i.e., Mid Columbia Producers, etc.)?
   Response: MCP

7. What are typical expenditures associated with the agricultural practices on your land (e.g., seed, fertilizer, chemicals, fuel, etc.)? Who do you purchase these materials from (e.g., Wasco Farm Store, etc.)? And can you provide annual estimates for each expenditure or average dollar per acre in expenses?
   Response: Typical expenditures associated with dryland farming purchased from a variety of vendors both locally and elsewhere.

8. What details can you provide regarding historic agricultural revenues on your parcel(s) over the past 5-10 years (e.g., annual revenues from agricultural production)? **Response:** Varies with market and crop conditions and expenditures.

9. How many direct jobs are currently supported by operations where the Project would be located, and would any be eliminated if the Project is built?
   Response: Grant does the farming. He will not be out of a job.

10. Would jobs for your agricultural operations elsewhere be impacted or supported by implementation of the project? If yes, how? **Response:** No

11. To what extent, if any, do you anticipate reducing current spending on labor, supplies, and services for agricultural operations due to implementation of the Project?
    Response: We will not be spending on chemicals, seed, fertilizer and other expenses associated with dryland wheat farming.

Compatibility With Adjacent Farmlands

12. Do you currently have Biglow Wind turbines on your land and if so, are you able to farm near the wind turbines? **Response:** No.

    How has the construction activities or traffic from routine operations at the wind farm impacted your farming practices? **Response:** No.

13. With the implementation of the Biglow Solar Project, would you continue to farm/ranch lands adjacent to the solar array areas or elsewhere throughout the local area? If yes, would the Project potentially impact farming practices outside of where solar facilities would be located? If yes, how?
    Response: Will not impact farming outside of leased area.

14. Do you have suggestions for how the Biglow Solar Project can aid your continued agricultural production?
    Response: Income from solar project will enhance economic viability of agricultural production.

15. How would you expect your agricultural operations to be impacted by construction of the Biglow Solar Project (i.e., dust, traffic)? **Response:** We will no longer farm leased land. Less labor and machine hours.

16. Do you have any information regarding farm practices on neighboring properties and would you anticipate any impact to those practices due to implementation of the Project?
    Response: Not to my knowledge. We do not have information on the neighbors farming practices.

Soil and Water Rights

17. Based on your assessment, describe the soil conditions on your parcel(s):
    Response: Good to excellent farming soil for Sherman County.

18. Does the leased land currently have water rights?

    Response: No, for over two hundred years no water rights. It did have a well for a home which has been abandoned.

    What steps, if any, have you taken to establish a water right? **Response:** None.

19. Is there any current consideration or attempt to cancel a water right or transfer a water right to or from the leased land proposed for Project use? **Response:** No.

20. In your estimation, how much water do you think you would need to be reasonably certain you could make more productive agricultural use of your land and justify the necessary capital investment in irrigation infrastructure? **Response:** I have no idea. If you wanted an annual crop, it would take a great deal of water.

Attachment D-2. Economic Impact Analysis

Economic Impact Analysis

Biglow Canyon Wind Farm
Request for Amendment 5
October 2026

Prepared for

Portland General Electric Company

Prepared by

TETRA TECH

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AC	alternating current
BCWF or Existing Facility	Biglow Canyon Wind Farm
BEA	Bureau of Economic Analysis
BESS	battery energy storage system
BIGL 2 or Project Developer	BIGL 2, LLC
BLS	Bureau of Labor Statistics
CBP	Census Bureau County Business Patterns
Certificate Holder or PGE	Portland General Electric Company
CEW	Census of Employment and Wages
FTE	full-time equivalent
gen-tie	generation tie
MW	megawatt
MWh	megawatt hour
PV	photovoltaic
REA	Regional Economic Accounts
RFA	Request for Amendment
Site Certificate	Site Certificate on Amendment 4
Solar Facility	solar energy generation and battery storage components
USDA	U.S. Department of Agriculture

Executive Summary

The Portland General Electric Company (PGE or Certificate Holder) is submitting a Request for Amendment (RFA) 5 to the Site Certificate on Amendment 4, issued March 27, 2026 (Site Certificate) for the Biglow Canyon Wind Farm (BCWF or Existing Facility) to add a second phase of photovoltaic (PV) solar energy generation and battery storage capacity (Solar Components). Located approximately 2.5 miles northeast of Wasco in Sherman County, Oregon, BCWF currently consists of 217 operating wind turbines, with a peak generating capacity of 450 megawatts (MW). RFA 4, approved March 27, 2026, added 125 MW alternating current (AC) generating capacity from PV solar arrays and 500 megawatt-hours in battery storage capacity. The solar energy generation and battery storage components (Solar Facility) described in RFA 4 are currently under construction. In RFA 5, PGE proposes to add a 200-MW AC generating capacity from PV solar arrays and 1,000 megawatt-hour in battery storage capacity (RFA 5 Solar Facility) by expanding the overall BCWF site boundary by approximately 839 acres. The RFA 5 Solar Facilityis located across approximately 622 acres of the existing BCWF site boundary and 839 acres of expanded site boundary, for a total of approximately 1,461 acres (together, RFA 5 Site Boundary). Power generated from the Solar Components will be transferred to the grid via a 230-kilovolt generation tie transmission line, approximately 2.7 miles long.

This report prepared on behalf of PGE assesses the economic impacts of the Solar Facility as proposed under RFA 5. Regional economic impacts are assessed for a three-county region (Sherman, Hood River, and Wasco Counties, Oregon) in terms of employment, labor income, and economic output using the IMPLAN economic modeling package, with separate analyses presented for construction and operation.

One-Time Impacts During Construction

Construction of the RFA 5 Solar Facility (i.e., Project) would generate substantial short-term economic benefits in the three county region during the 18-month construction period. Construction would provide direct on-site employment for construction workers and support secondary (indirect and induced) impacts elsewhere in the local economy.

- Project construction is expected to employ an average of 200 workers on site, with a monthly peak of 550 workers on-site at the same time. Viewed in terms of full-time equivalent (FTE) jobs or job-years, Project construction would involve an estimated total of 300 on-site FTE jobs, with 30 percent of the total (75 jobs) assumed to be filled by local workers (i.e., workers normally resident in the three analysis area counties).[1]
- Project construction would also support an estimated 123 indirect and 40 induced jobs in the three-county region. Overall, Project construction is estimated to support a total of

[1] Each FTE job equates to one full-time job for one year or 2,080-hour units of labor. Part-time or temporary jobs constitute a fraction of a job. For example, if an engineer works just 3 months on a solar project, that would be considered one-quarter of an FTE job.

approximately 463 FTE jobs and approximately $39 million in labor income, with total economic output of approximately $78 million (Table ES-1).

Table ES-1. Estimated Construction Phase Impacts

Impact Measure	Employment (FTE Jobs)[1]	Labor Income ($ million)[2]	Output ($ million)[2]
Direct	300	28.7	46.7
Indirect	123	7.5	23.4
Induced	40	2.6	7.9
Total	**463**	**38.8**	**78.0**

Notes:
FTE = full-time equivalent
1. Jobs are FTE for a period of one year (1 FTE = 2,080 hours). Direct jobs represent the total workforce that would be employed on-site during construction and include both local and non-local workers.
2. Labor income and economic output are expressed in millions of dollars in Year 2026 dollars.

Annual Operation Impacts

Project operation would provide long-term annual economic benefits in the three-county region, with estimated benefits anticipated to occur each year that the Project is operating.

- Four full-time employees would be employed on-site to operate and maintain the Project, with all of these workers expected to reside in the three county area. Overall, Project operation is estimated to support approximately nine total (direct, indirect, and induced) jobs in the three-county region and approximately $1.5 million in labor income, with total economic output of approximately $6 million (Table ES-2).

Table ES-2. Estimated Annual Operation Economic Impacts

Impact[1]	Employment (FTE Jobs)[2]	Labor Income ($ million)[3]	Output ($ million)[3]
Direct	4	1.0	3.9
Indirect	2	0.2	1.3
Induced	3	0.2	0.6
Total	**9**	**1.5**	**5.8**

Notes:
FTE = Full-time equivalent
1. Estimates are annual impacts that would occur each year the Project is in operation. Estimates are for the first year of operation.
2. Jobs are FTE for a period of one year (1 FTE = 2,080 hours).
3. Labor income and economic output are expressed in millions of dollars in Year 2026 dollars.

1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) is submitting a Request for Amendment (RFA) 5 to the existing Site Certificate on Amendment 4, issued March 27, 2026 (Site Certificate) for the Biglow Canyon Wind Farm (BCWF or Existing Facility) to add a second phase of photovoltaic (PV) solar energy generation and battery storage capacity (Solar Components). Located approximately 2.5 miles northeast of Wasco in Sherman County, Oregon, BCWF currently consists of 217 operating wind turbines, with a peak generating capacity of 450 megawatts (MW). RFA 4, approved March 27, 2026, added 125 MW alternating current (AC) generating capacity from PV solar arrays and 500 megawatt-hours (MWh) in battery storage capacity. The solar energy generation and battery storage components (Solar Facility) described in RFA 4 are currently under construction. In RFA 5, PGE proposes to add a 200-MW AC generating capacity from PV solar arrays and 1,000 MWh in battery storage capacity (RFA 5 Solar Facility) by expanding the overall BCWF site boundary by approximately 839 acres. The RFA 5 Solar Facility is located across approximately 622 acres of the existing BCWF site boundary and 839 acres of expanded site boundary, for a total of approximately 1,461 acres (together, RFA 5 Site Boundary).

Primary infrastructure includes solar arrays, inverters, battery energy storage system (BESS) facilities and their subcomponents (i.e., inverters), one collector substation, and medium-voltage collector lines, operations and maintenance structures, site access roads, internal roads, perimeter fencing, facility entry gates, and temporary laydown areas (herein collectively referred to as “Solar Components”). Power generated from the Solar Components will be transferred to the grid via a 230-kilovolt generation tie (gen-tie) transmission line, approximately 2.7 miles long.

PGE will own and operate the RFA 5 Solar Facility as a part of the BCWF, which, to date, has been developed by BIGL 2, LLC (BIGL 2, or Project Developer). BIGL 2, in its capacity as the Project Developer, supports PGE in RFA 5 and may construct and temporarily operate the RFA 5 Solar Facility on behalf of PGE under a Build-Transfer Agreement.

This report prepared on behalf of PGE assesses the economic impacts of the RFA 5 Solar Facility. Regional economic impacts are assessed for a three county region (Sherman, Hood River, and Wasco Counties, Oregon) in terms of employment, labor income, and economic output using the IMPLAN economic modeling package, with separate analyses presented for construction and operation.

2.0 Regional Demographic and Economic Overview

2.1 Population

The three counties that make up the analysis area had a combined total estimated population of 52,765 in 2025 (Table 1). Sherman County accounted for 4 percent (2,001 residents) of this total, with the remaining 96 percent divided between Hood River (46 percent, 24,361 residents) and

Wasco (50 percent, 26,403 residents). Located in northcentral Oregon, all three counties are bordered to the north by the Columbia River and the State of Washington (Figure 1).

Sherman County is approximately 824 square miles in size, with slightly more than three-quarters (76 percent) of the county used for agriculture (U.S. Census Bureau 2026, U.S. Department of Agriculture [USDA] 2022). With a total estimated population of 2,001 in 2025, Sherman County ranked 35 out of the 36 counties in Oregon in terms of population (Portland State University 2026). The county is sparsely populated with a 2025 population density of 2.5 people per square mile, well below the corresponding state and national averages of 44.5 and 96.7 people per square mile, respectively (U.S. Census Bureau 2026). There are four incorporated communities in Sherman County (Grass Valley, Moro, Rufus, and Wasco), which together account for almost two-thirds (62 percent) of the population (Table 1). The overall county population has increased over the past 15 years, with most of the growth occurring in Moro, Rufus, and unincorporated parts of the county.

Wasco County borders Sherman County to the west and south (Figure 1). Almost three times as large as Sherman County, Wasco County is 2,381 square miles in size, with almost two-thirds (64 percent) of the county used for agriculture (U.S. Census Bureau 2026, USDA 2022). Wasco County is also sparsely populated, with a population density of 11 people per square mile in 2025 (U.S. Census Bureau 2026). More than half (61 percent) of the total population in Wasco County lives in The Dalles, which is the largest city and the county seat.

Hood River County located west of Wasco County, is the smallest of the three counties (Figure 1). Approximately 522 square miles in size, Hood River County had an estimated population density of 45.4 people per square mile in 2025 (U.S. Census Bureau 2026). Hood River, the largest city and county seat of Hood River County, accounted for 35 percent of the total county population, with the remaining population living in Cascade Locks (6 percent) and unincorporated areas (59 percent) (Table 1).

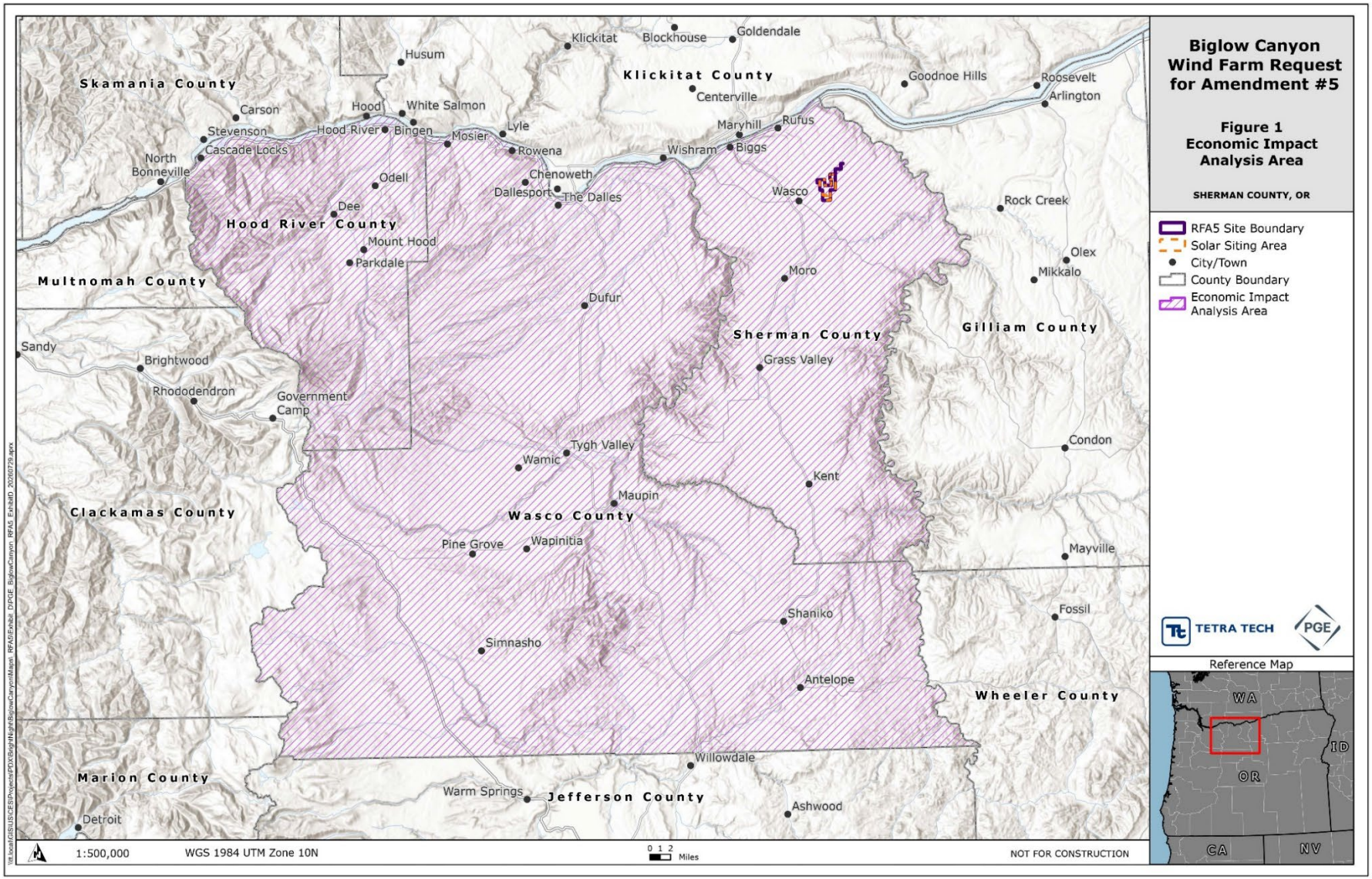

Biglow Canyon Wind Farm Request for Amendment #5
Figure 1
Economic Impact Analysis Area
SHERMAN COUNTY, OR
RFA5 Site Boundary
Solar Siting Area
City/Town
County Boundary
Economic Impact Analysis Area
TETRA TECH
PGE
Reference Map
WA
ID
OR
CA
NV
Skamania County
Klickitat County
Hood River County
Multnomah County
Sherman County
Gilliam County
Clackamas County
Wasco County
Marion County
Jefferson County
Wheeler County
Husum
Klickitat
Blockhouse
Goldendale
Centerville
Goodnoe Hills
Roosevelt
Arlington
Carson
Hood
White Salmon
Stevenson
Hood River
Bingen
Mosier
Lyle
Rowena
Maryhill
Rufus
Biggs
Wishram
Cascade Locks
North Bonneville
Odell
Chenoweth
Dallesport
The Dalles
Wasco
Rock Creek
Dee
Mount Hood
Parkdale
Olex
Mikkalo
Moro
Dufur
Sandy
Brightwood
Rhododendron
Government Camp
Grass Valley
Tygh Valley
Wamic
Condon
Kent
Maupin
Pine Grove
Wapinitia
Mayville
Fossil
Shaniko
Simnasho
Antelope
Willowdale
Warm Springs
Ashwood
Detroit
1:500,000
WGS 1984 UTM Zone 10N
0 1 2
Miles
NOT FOR CONSTRUCTION

Table 1. Population

Geographic Area	2025		Change 2010 to 2025	
	Estimated Population	Percent of County Total	Net Change	Percent Change
Sherman County	**2,001**	**100%**	**236**	**13.4%**
Grass Valley city	164	8%	0	0.0%
Moro city	378	19%	54	16.7%
Rufus city	279	14%	30	12.0%
Wasco city	428	21%	18	4.4%
Unincorporated	752	38%	134	21.7%
Hood River County	**24,361**	**100%**	**2,015**	**9.0%**
Cascade Locks city	1,415	6%	271	23.7%
Hood River city	8,633	35%	1,466	20.5%
Unincorporated	14,313	59%	278	2.0%
Wasco County	**26,403**	**100%**	**1,190**	**4.7%**
The Dalles city	16,223	61%	2,603	19.1%
Other Incorporated[1]	1,645	6%	108	6.6%
Unincorporated	8,535	32%	-1,521	-15.1%
Analysis Area Total	**52,765**	**na**	**3,441**	**7.0%**

Note:
1. The other incorporated communities in Wasco County are the cities of Antelope, Dufur, Maupin, Mosier, and Shaniko. Dufur is the largest of these communities with a total estimated population of 647 in 2025.
Source: Portland State University 2026

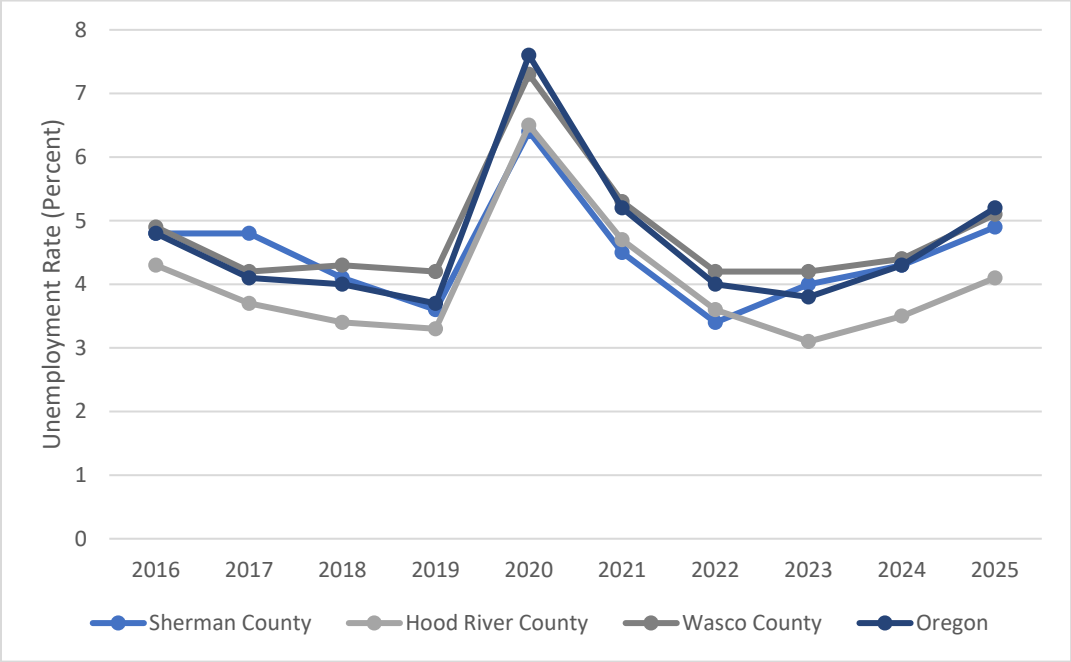
2.2 Employment and the Economy

The three-county region (Sherman, Hood River, and Wasco Counties, Oregon) had a total combined labor force of more than 28,000 in 2025. Sherman County accounted for just 3 percent (939 workers) of the total, with the remaining 97 percent fairly evenly divided between Hood River and Wasco Counties. Annual average unemployment rates were lower than the state average (5.2 percent) in all three counties in 2025, ranging from 4.1 percent (Hood River County) to 5.1 percent (Wasco County) (Table 2).

Table 2. Annual Average Employment and Unemployment, 2025

Geographic Area	Labor Force	Employed	Unemployed	Unemployment Rate
Sherman County	939	893	46	4.9
Hood River County	13,905	13,329	576	4.1
Wasco County	13,376	12,691	685	5.1
Three County Total	**28,220**	**26,913**	**1,307**	**4.6**
Oregon	**2,214,726**	**2,100,102**	**114,624**	**5.2**
Source: Oregon Employment Department 2026				

Average annual unemployment rates have followed a similar trend statewide and in all three counties over the past decade (Figure 2). All three areas experienced a sharp COVID-related uptick in unemployment in 2020, with rates subsequently returning to pre-COVID levels. More recently annual rates have trended upward in all four areas.

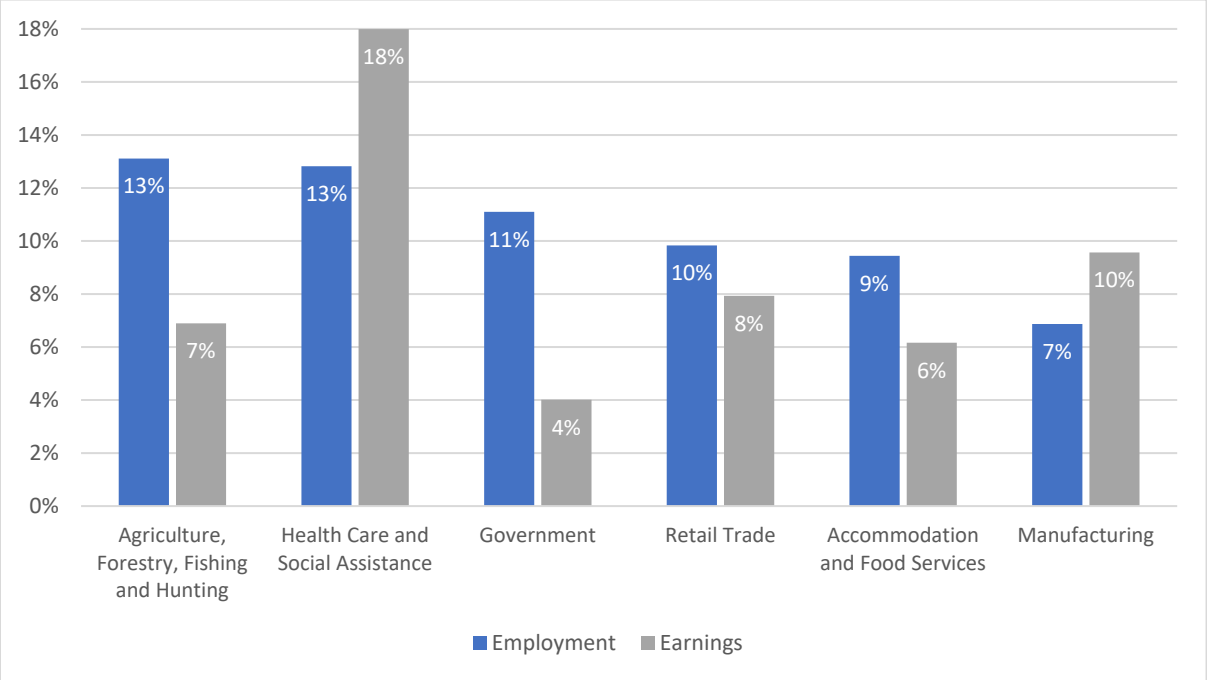


Source: Oregon Employment Department 2026

Figure 2. Annual Average Unemployment Rates, 2016 to 2025

This report uses IMPLAN input-output software to assess the effects of the Solar Facility as proposed under RFA 5 on the economy of the three-county region. Using data compiled from various sources, including the Bureau of Labor Statistics (BLS) Census of Employment and Wages (CEW), Census Bureau County Business Patterns (CBP), and Bureau of Economic Analysis (BEA) Regional Economic Accounts (REA), the IMPLAN model provides detailed baseline estimates for a series of measures including employment, labor income, output, and value added by economic sector. The IMPLAN model is described in more detail in Section 3.1, below.

Figure 3 shows employment and total earnings estimates by sector for the largest sectors in the three-county region for 2024. Agriculture, forestry, fishing, and hunting and health care and social assistance were the largest employers, each accounting for 13 percent of total employment in the three county region in 2024. Viewed by county, the agriculture, forestry, fishing, and hunting sector ranged from 12 percent of total employment in Hood River County to 21 percent in Sherman County (IMPLAN 2026).



Note:
1/ Data are from IMPLAN and aggregated by the 2-digit North American Industry Classification System Code scheme. Employment data include full-time, part-time, and seasonal jobs. Data are included for the largest sectors only. IMPLAN estimates are based on data compiled from various federal sources, including the U.S. Bureau of Labor Statistics, U.S. Census Bureau County Business Patterns, and U.S. Bureau of Economic Analysis Regional Economic Accounts.
Source: IMPLAN 2026

Figure 3. Employment by Economic Sector in the Three-County Region, 2024

3.0 Methodology

The economic impact of the RFA 5 Solar Facility (i.e., Project) would occur in two stages: 1) the initial construction stage; and 2) following construction, the operations stage. This report assesses both stages using IMPLAN input-output software tailored for use in the three-county analysis area. Impacts are assessed using IMPLAN data for 2024, the most recent year for which data are available. Construction and operation of the proposed Project would generate economic benefits in the regional economy through direct expenditures for materials and services, as well as new payroll income.

3.1 Economic Impact Model

IMPLAN is a regional input-output model widely used to assess the economic impacts of energy and many other types of projects. The IMPLAN model divides the economy into 528 sectors, including government, households, farms, and other industries, and models the linkages between the various sectors. The linkages are modeled through input-output tables that account for all dollar flows between different sectors of the economy. The economic relationships modeled by IMPLAN allow the user to estimate the overall change in the economy that would result from construction and operation of a proposed project. The dollars spent on project construction and operation within the selected analysis area or areas (Sherman, Hood River, and Wasco Counties in this case) are analyzed to determine the total economic impact within that area. The direct investments in project construction and operation trigger successive rounds of spending that result in an overall increase in employment, labor income, and economic output in the local economy. Construction-related impacts are assessed as one-time impacts; operation-related impacts are modeled as annual impacts.

3.1.1 Impact Types

Economic multipliers derived from the model are used to estimate total economic impacts. Total economic impacts consist of three components: direct, indirect, and induced impacts.

- The *direct* impact component consists of expenditures made specifically for the proposed project, such as construction labor and materials. These direct impacts generate economic activity elsewhere in the local economy through the multiplier effect, as initial changes in demand "ripple" through the local economy and generate indirect and induced impacts.
- *Indirect* impacts are generated by expenditures on goods and services by suppliers who provide goods and services to the construction project. Indirect effects are often referred to as "supply-chain" impacts because they involve interactions among businesses.
- *Induced* impacts are generated by the spending of households associated either directly or indirectly with the proposed project. Workers employed during construction, for example, will use their income to purchase groceries and other household goods and services. Workers at businesses that supply the project during construction or operation will do the same. Induced impacts are also referred to as "consumption-driven" impacts.

3.1.2 Impact Measures

Impacts are assessed using the following measures that are reported by the IMPLAN model:

- *Jobs* – measured as the average number of employees engaged in full- or part-time work. Model outputs are adjusted to full-time equivalents (FTEs) using coefficients provided by IMPLAN.[2]

[2] Each FTE job equates to one full-time job for one year or 2,080-hour units of labor. Part-time or temporary jobs constitute a fraction of a job. For example, if an engineer works just 3 months on a solar project, that would be considered one-quarter of an FTE job.

- *Personal income* (or labor income) – expressed as the sum of employee compensation and proprietary income.
    - Employee compensation (wages) includes workers' wages and salaries, as well as other benefits such as health, disability, and life insurance; retirement payments; and non-cash compensation; expressed as total cost to the employer.
    - Proprietary income (business income) represents the payments received by small-business owners or self-employed workers.
- *Output* – the value of goods and services produced, which serves as a broad measure of economic activity.

3.2 Impact Sources

3.2.1 Construction

The Project consists of new 200-MW solar energy generation, a 1,000-MWh BESS facility, and an approximately 2.7-mile-long gen-tie line. Project construction is assumed to start in Q3 2027 and extend for 18 months, with completion anticipated in June 2028. PGE estimates that Project construction will directly employ an average of 200 workers on site over the 18-month construction period, with a monthly peak of 550 workers employed on the site at the same time. Viewed in terms of FTE jobs, with each identified job representing 12 months (2,080 hours) of employment, Project construction is expected to involve an estimated total of 300 on-site FTE jobs over the 18-month construction period.

Construction costs for this analysis were provided by the Project Developer, who supports the Certificate Holder in this RFA 5 and may construct and operate the Solar Facility as proposed under RFA 5 on behalf of PGE under a Build-Transfer Agreement. Specialized materials and equipment (solar modules, inverters, and battery units) account for the largest share of the overall construction cost for solar and BESS facilities, with these categories together accounting for almost half of the total installed cost. The majority of Project expenditures for these specialized materials and equipment are not expected to occur in the analysis area (Sherman, Hood River, or Wasco Counties, Oregon).

Expenditures expected to occur in the three analysis area counties include expenditures on concrete, rebar, equipment rentals, fencing, and other construction materials required to prepare the site. Construction labor-related expenditures that occur in the three-county region will also result in secondary economic impacts elsewhere in the local economy. Construction labor expenditures in this context refer to wage and salary payments to construction workers employed directly on-site. Payments to construction workers who normally reside in the three-county region would support local businesses as workers and their families purchase goods and services locally. Workers temporarily relocating to the region for the duration of their on-site employment will also spend money locally.

3.2.2 Operation

Once construction is complete, operation and maintenance of the Project will continue to contribute to the local economy. The Project will provide direct operation-related employment and Project-related operation expenditures will generate secondary (indirect and induced) economic benefits elsewhere in the local economy. The Project Developer estimates that Project operation will employ four full-time personnel on site. All of these workers are assumed to reside in the three-county region, most likely in Sherman County. Typical local operation-related expenditures include cleaning, inspection, replacement parts and equipment, and miscellaneous supplies.

3.3 Study Limitations

- Construction costs and related assumptions are based on the best data and information available at this stage in the Project development process. Direct Project inputs including workforce estimates and Project-related expenditures are best estimates based on information provided by the Project Developer and industry average data. Other key modeling assumptions include the share of expenditures expected to occur in the analysis area, as well as the share of workers expected to be hired locally. These assumptions and inputs could differ from actual conditions as the Project continues to develop, resulting in different economic and fiscal impacts.

- The IMPLAN model used for this study relies upon a set of simplifying assumptions that are necessary to model a regional economy and is subject to the limitations common to input-output models.

4.0 Economic Impacts

4.1 Construction Phase Impacts

Estimated construction impacts that would occur in the three-county region are summarized in Table 3 and Figure 4. These estimates are one-time impacts for the construction period developed using IMPLAN modeling software and 2024 IMPLAN data for Sherman, Hood River, and Wasco Counties. Job estimates are presented in FTEs or job-years, with each identified job representing 12 months (2,080 hours) of employment. Construction of the Project is expected to involve an estimated total of 300 on-site FTE jobs over the 18-month construction period, with 30 percent of the total (75 jobs) assumed to be filled by local workers (i.e., workers normally resident in one of the three analysis area counties). On-site jobs expected to be filled by local workers include those associated with site work, foundations, and electrical work.

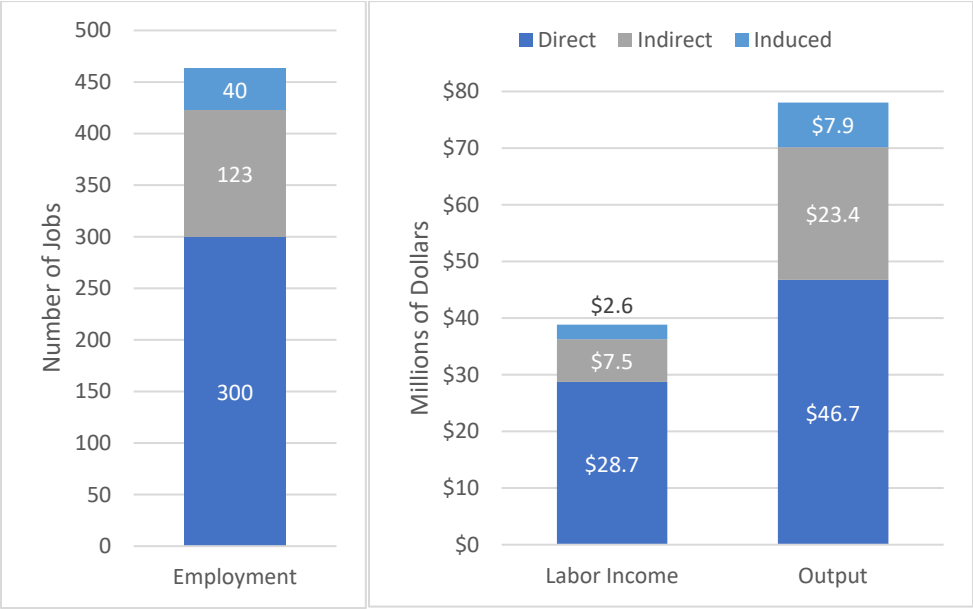
Project construction would also support employment, labor income, and economic output in other sectors of the local economy, with indirect impacts estimated to support approximately 123 jobs and induced impacts estimated to support a further 40 jobs in the analysis area (Table 3, Figure 4). Overall, Project construction is estimated to support a total of approximately 463 FTE jobs and

approximately $39 million in labor income, with total economic output of approximately $78 million. Based on the current anticipated schedule, these impacts would be distributed over 18 months, with construction anticipated to extend from Q3 2027 through June 2028.

Table 3. Estimated Construction Phase Impacts

Impact Measure	Employment (FTE Jobs)[1]	Labor Income ($ million)[2]	Output ($ million)[2]
Direct	300	28.7	46.7
Indirect	123	7.5	23.4
Induced	40	2.6	7.9
Total	**463**	**38.8**	**78.0**

Notes:
FTE = full-time equivalent
1. Jobs are FTE for a period of one year (1 FTE = 2,080 hours). Direct jobs represent the total workforce that would be employed on-site during construction and include both local and non-local workers.
2. Labor income and economic output are expressed in millions of dollars in Year 2026 dollars.



Notes:
1. Employment is expressed in FTE jobs (1 FTE = 2,080 hours)
2. Labor income and economic output are expressed in millions of dollars in 2026 dollars

Figure 4. Estimated Construction Phase Impacts

4.2 Annual Operation Impacts

Estimated operation impacts that would occur in the three-county analysis area are summarized in Table 4. These estimates are annual average impacts based on estimated operations and maintenance employment and expenditures for a 40-year period of operation. Four full-time employees would be employed on-site to operate and maintain the Project, with all of these workers expected to reside in

the three-county region, most likely in Sherman County. Operation and maintenance of the Project would also support employment, labor income, and economic output in other sectors of the local economy. Indirect impacts are estimated to support approximately two jobs, with induced impacts estimated to support approximately three jobs (Table 4).

Overall, Project operation is estimated to support approximately nine total (direct, indirect, and induced) jobs in the analysis area counties and approximately $1.5 million in labor income, with total economic output of approximately $5.8 million. These estimated annual impacts are expected to occur each year that the Project operates.

Table 4. Estimated Annual Operation Economic Impacts

Impact[1]	Employment (FTE Jobs)[2]	Labor Income ($ million)[3]	Output ($ million)[3]
Direct	4	1.0	3.9
Indirect	2	0.2	1.3
Induced	3	0.2	0.6
Total	**9**	**1.5**	**5.8**

Notes:
FTE = Full-time equivalent
1. Estimates are annual impacts that would occur each year the Project is in operation. Estimates are for the first year of operation.
2. Jobs are FTE for a period of one year (1 FTE = 2,080 hours).
3. Labor income and economic output are expressed in millions of dollars in Year 2026 dollars.

5.0 References

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Attachment D-3: Fiscal Impact Analysis

Fiscal Impact Analysis

Biglow Canyon Wind Farm
Request for Amendment 5
October 2026

Prepared for

Portland General Electric Company

Prepared by

TETRA TECH

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AC	alternating current
BCWF or Existing Facility	Biglow Canyon Wind Farm
BESS	battery energy storage system
BIGL 2 or Project Developer	BIGL 2, LLC
Certificate Holder or PGE	Portland General Electric Company
ESD	Education Special District
FY	fiscal year
gen-tie	generation tie
MAV	maximum assessed value
MW	megawatt
MWh	megawatt hour
ODOE	Oregon Department of Energy
RFA	Request for Amendment
RMV	real market value
RRED	Rural Renewable Energy Development
SIP	Strategic Investment Program
Site Certificate	Site Certificate on Amendment 4
Solar Facility	solar energy generation and battery storage components
Solar PILOT	Solar Payment in Lieu of Taxes

Executive Summary

The Portland General Electric Company (PGE or Certificate Holder) is submitting a Request for Amendment 5 (RFA 5) to the Site Certificate on Amendment 4, issued March 27, 2026 (Site Certificate) for the Biglow Canyon Wind Farm (BCWF or Existing Facility) to add a second phase of photovoltaic (PV) solar energy generation and battery storage capacity to the BCWF following the solar power generation and battery storage capacity approved under RFA 4. Located approximately 2.5 miles northeast of Wasco in Sherman County, Oregon, BCWF currently consists of 217 operating wind turbines, with a peak generating capacity of 450 megawatts (MW). RFA 4, approved March 27, 2026, added 125 MW alternating current (AC) generating capacity from PV solar arrays and 500 megawatt-hours in battery storage capacity. The solar energy generation and battery storage components (Solar Facility) described in RFA 4 are currently under construction. In RFA 5, PGE proposes to add 200-MW AC generating capacity from PV solar arrays and 1,000 megawatt-hours in battery storage capacity (RFA 5 Solar Facility) by expanding the overall BCWF site boundary by approximately 839 acres. The RFA 5 Solar Facility is located across approximately 622 acres of the existing BCWF site boundary and 839 acres of expanded site boundary, for a total of approximately 1,461 acres (together, RFA 5 Site Boundary). Power generated from the Solar Components will be transferred to the grid via a 230-kilovolt generation tie transmission line, approximately 2.7 miles long.

This report prepared on behalf of PGE assesses the fiscal impacts of the RFA 5 Solar Facility (the "Project") and estimates local tax revenues that would be expected to accrue over the operating life of the Project. PGE has not entered into any tax arrangements with Sherman County for the Project at this time, but intends to negotiate an agreement under the Fee in Lieu of Property Taxes for solar projects program (referred to as the Solar Payment in Lieu of Taxes [Solar PILOT] in this report). Estimates are provided for two scenarios. The first scenario assumes the Solar PILOT would extend for 15 years; the second scenario assumes it would extend for the full 20 years allowed under the program.

The results of this assessment are summarized in Table ES-1, which shows estimated payments to Sherman County under the two scenarios in 5-year increments for the assumed 40-year operating life of the Project. Estimates are 5-year totals, not annual averages. Total estimated payments to Sherman County under the two scenarios would range from approximately $80.5 million (20-year Solar PILOT) to $103.7 million (15-year Solar PILOT) over the assumed 40-year operating life of the Project (Table ES-1).

Table ES-1. Estimated Property Tax Revenues by Solar PILOT Scenario ($ million)

Years[1]	Solar PILOT(15 year)[2]	Solar PILOT(20 year)[2]
1 to 5	5.5	5.5
6 to 10	5.5	5.5
11 to 15	5.5	5.5
16 to 20	28.7	5.5
21 to 25	17.9	17.9
26 to 30	13.5	13.5
31 to 35	13.5	13.5
36 to 40	13.5	13.5
Total	**103.7**	**80.5**

Notes:

1. Estimates are in millions of dollars and 5-year totals, not annual averages.

2. Solar PILOT estimates assume that the Project would pay $5,500 per MW for either 15 or 20 years. Per Oregon Senate Bill 154, payments could range from $5,500 to $7,000 per MW. Therefore, these estimates represent the lower range of potential payments under a Solar PILOT agreement.

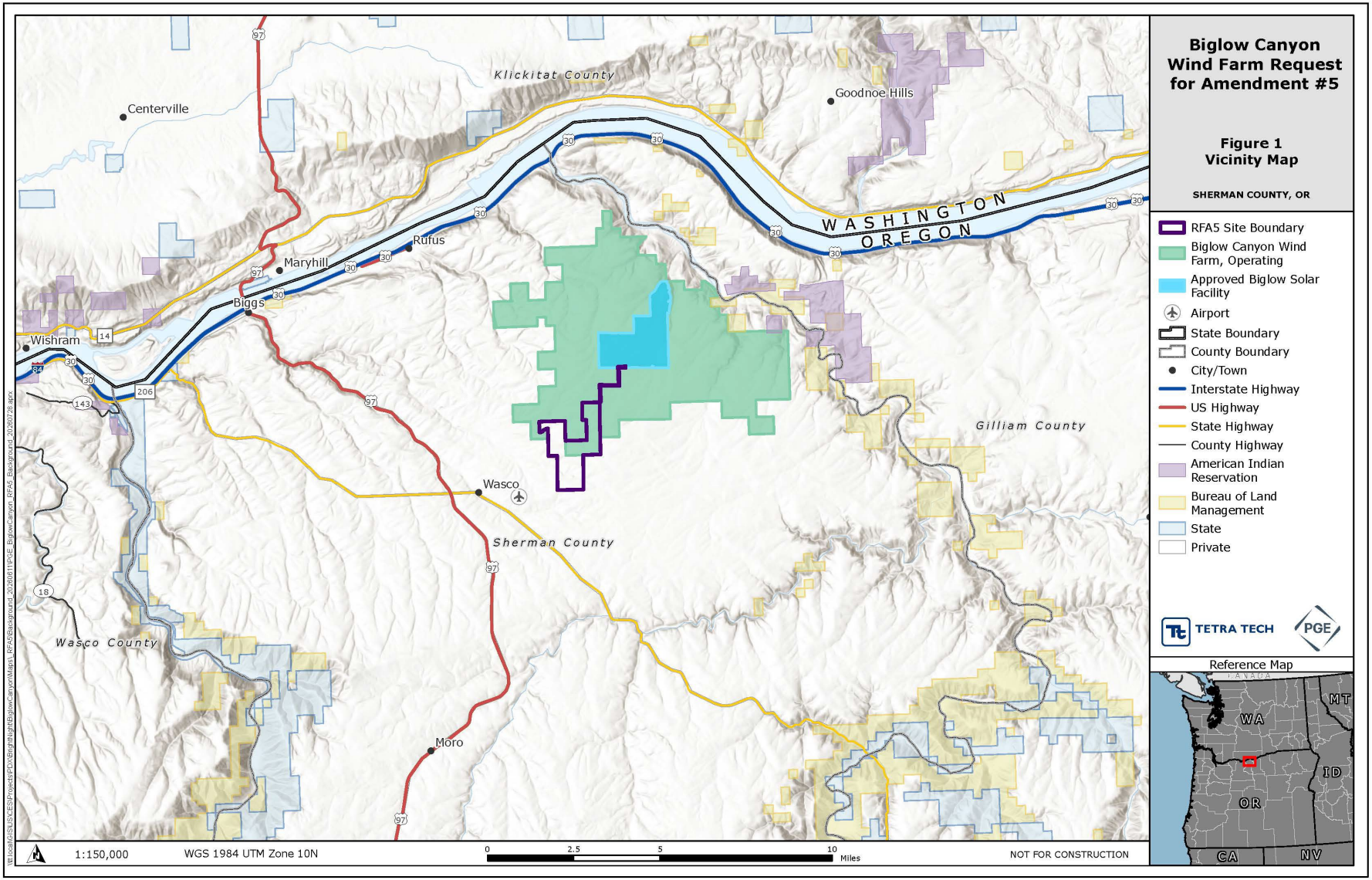
1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) is submitting a Request for Amendment (RFA) 5 to the existing Site Certificate on Amendment 4, issued March 27, 2026 (Site Certificate) for the Biglow Canyon Wind Farm (BCWF or Existing Facility) to add a second phase of photovoltaic (PV) solar energy generation and battery storage capacity to the BCWF following the solar power generation and battery storage capacity approved under RFA 4. Located approximately 2.5 miles northeast of Wasco in Sherman County, Oregon (Figure 1), BCWF currently consists of 217 operating wind turbines, with a peak generating capacity of 450 megawatts (MW). RFA 4, approved March 27, 2026, added 125 MW alternating current (AC) generating capacity from PV solar arrays and 500 megawatt-hours (MWh) in battery storage capacity. The solar energy generation and battery storage components (Solar Facility) described in RFA 4 are currently under construction. In RFA 5, PGE proposes to add 200-MW AC generating capacity from PV solar arrays and 1,000 MWh in battery storage capacity (RFA 5 Solar Facility) by expanding the overall BCWF site boundary by approximately 839 acres. The RFA 5 Solar Facility 5 is located across approximately 622 acres of the existing BCWF site boundary and 839 acres of expanded site boundary, for a total of approximately 1,461 acres (together, RFA 5 Site Boundary).

Primary infrastructure includes solar arrays, inverters, battery energy storage system (BESS) facilities and their subcomponents (i.e., inverters), one collector substation, and medium-voltage collector lines, operations and maintenance structures, site access roads, internal roads, perimeter fencing, facility entry gates, and temporary laydown areas (herein collectively referred to as “Solar Components”). Power generated from the Solar Components will be transferred to the grid via a 230-kilovolt generation tie (gen-tie) transmission line, approximately 2.7 miles long.

PGE will own and operate the RFA 5 Solar Facility as a part of the BCWF, which, to date, has been developed by BIGL 2, LLC (BIGL 2, or Project Developer). BIGL 2, in its capacity as the Project Developer, supports PGE in RFA 5 and may construct and temporarily operate the RFA 5 Solar Facility (the “Project”) on behalf of PGE under a Build-Transfer Agreement.

The Project would generate significant economic benefits for Sherman County. As noted in the Oregon Department of Energy’s (ODOE) memorandum dated October 5, 2021, local economic benefits associated with a proposed solar facility typically include lease payments to underlying landowners, direct economic benefits to local governments, and various other direct and indirect benefits to the local economy (ODOE 2021a). The following assessment prepared on behalf of PGE estimates the direct benefits to local governments that would be generated in the form of property tax revenues.


Biglow Canyon Wind Farm Request for Amendment #5
Figure 1
Vicinity Map
SHERMAN COUNTY, OR
RFA5 Site Boundary
Biglow Canyon Wind Farm, Operating
Approved Biglow Solar Facility
Airport
State Boundary
County Boundary
City/Town
Interstate Highway
US Highway
State Highway
County Highway
American Indian Reservation
Bureau of Land Management
State
Private
TETRA TECH
PGE
Reference Map
Klickitat County
Centerville
Goodnoe Hills
WASHINGTON
OREGON
Rufus
Maryhill
Biggs
Wishram
Gilliam County
Wasco
Sherman County
Wasco County
Moro
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WGS 1984 UTM Zone 10N
0 2.5 5 10 Miles
NOT FOR CONSTRUCTION

2.0 Overview of Oregon Property Taxes

Property taxes are one of the most important sources of revenue for the public sector in Oregon, helping to support police, fire protection, education, and other services provided by local taxing districts. More than 1,200 districts impose property taxes in Oregon, including K-12 Schools and Education Special Districts (ESDs), cities, counties, and community colleges, as well as other special districts, such as fire, road, library, hospital, and park special districts.

The total amount of property tax due is based on the assessed value of the property and the combined tax rates of the local taxing districts with taxing authority over the property. Property assessment involves identifying and assigning a value to taxable property. Most property is assessed by county assessors, but some types of property, including public utilities and large industrial properties, are assessed by the Oregon Department of Revenue. Local taxing districts combine to form Tax Code Areas, which represent unique combinations of overlapping taxing districts. The resulting combined levy or millage rate varies by tax code area. The levy or millage rate, which determines the amount an individual property owner owes, is expressed as a dollar amount per $1,000 assessed value. A jurisdiction with a levy rate of 10 mills, for example, imposes tax at the rate of $10 per $1,000 of property value.

In Oregon, a property's assessed value is the lower of its real market value (RMV) or maximum assessed value (MAV). RMV is typically the price a willing buyer would pay to a willing seller. First established in the 1997-98 tax year, MAV is a taxable value limit established for each property. Statewide Measure 50, passed in 1997, limits the rate of growth of property value subject to taxation based on the MAV, with the annual growth rate limited to 3 percent, unless there are changes to the property, such as the addition of a new structure, improvement to an existing structure, or subdivision or partition of the property (Oregon Department of Revenue 2026).

The Oregon Constitution also limits the amount of property taxes that can be collected from each individual property. Measure 5, passed in 1990, divided taxes into education and general government categories, and limits the amounts that can be collected to $5 per $1,000 RMV for school taxes and $10 per $1,000 RMV for general government taxes. In cases where taxes in either category exceed the limit for a property, the taxes are reduced or "compressed" until the limit is reached (Oregon Department of Revenue 2020, 2026).

Passage of Measures 5 and 50 caused a substantial change in Oregon's school funding system by limiting property taxes for schools, which caused a shift in funding from local property taxes to the state general fund (Oregon Legislative Revenue Office 2020). Following passage of Measure 5, the state legislature adopted a K-12 equalization formula that substantially reduced local control over school funding. The equalization formula is designed to ensure financial equity among school districts, with each school district receiving an allocation per student in combined state and local funds. This distribution formula requires that any increase in property tax revenues be offset by a decrease in state funding. As summarized by the Oregon Legislative Revenue Office (2020, p. 3):

In effect, the formula converts local school revenue resources into part of available statewide funds for all schools. It does not matter what a district receives in property taxes or other local revenues. The only revenue that matters is the statewide sum of state and local dollars. This statewide sum, minus statutorily listed expenditures from state fund, is commonly called the formula revenue available for distribution.

2.1 Renewable Energy Incentives

Three types of tax incentives are available for renewable energy projects in Sherman County: the Fee in Lieu of Property Taxes for solar projects program[1]; the Strategic Investment Program (SIP); and the Rural Renewable Energy Development (RRED) Zone program. PGE has not entered into any tax arrangements with Sherman County at this time, but intends to negotiate an agreement under the Fee in Lieu of Property Taxes for solar projects program (referred to as the Solar Payment in Lieu of Taxes [Solar PILOT] in this report). The following section provides an overview of this program.

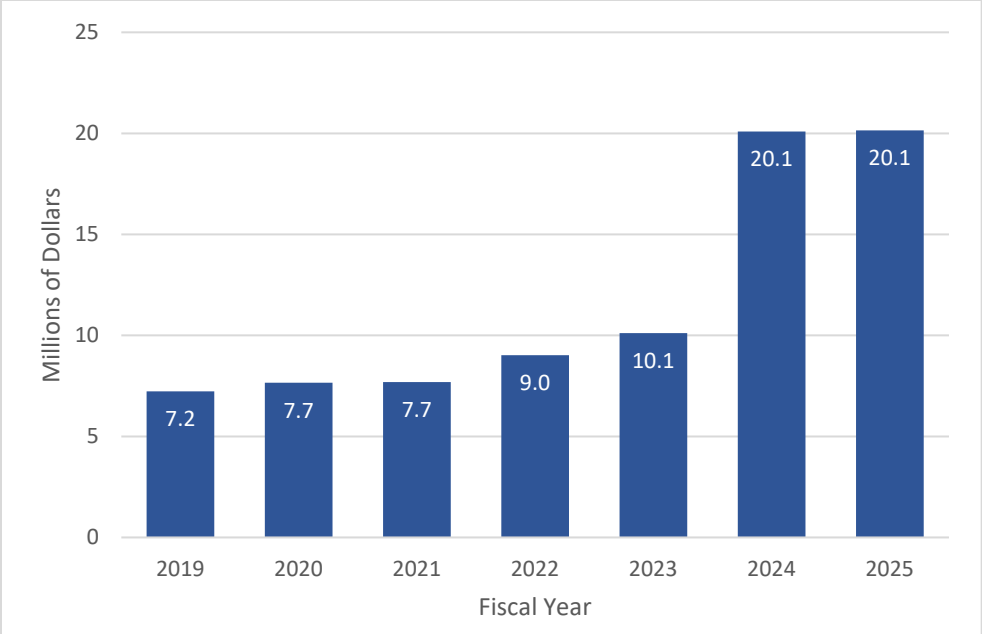
2.1.1 Fee in Lieu of Property Taxes for Solar Projects

In 2015, the Oregon legislature passed an act temporarily authorizing counties to enter into a Solar PILOT with solar project owners. Under this type of agreement, a solar project may be exempt from property taxes for up to 20 years, contingent on the annual payment to the county of a flat fee of $7,000 per MW of nameplate capacity. Initially set to expire in January 2022, the passage of Oregon Senate Bill 154 (effective September 25, 2021) extended the expiration date to January 2028 and modified the fee amount from $7,000 per MW per year to a range of $5,500 to $7,000 per MW. The bill also clarified that the fees shall be apportioned and distributed among the taxing districts that have jurisdiction over the property (ODOE 2021b).

3.0 Sherman County Property Tax Revenues

Total property tax revenues are summarized for Sherman County from 2019 to 2025 in Figure 2. There were 12 taxing districts in Sherman County in 2025, which together imposed $20.1 million in property taxes after "compression." Compression reduced total estimated revenues by approximately $900,000 in 2025, from approximately $21.0 million to $20.1 million (Oregon Department of Revenue 2025).

[1] This program is referred to as the Solar Payment in Lieu of Taxes (Solar PILOT) in the following sections.

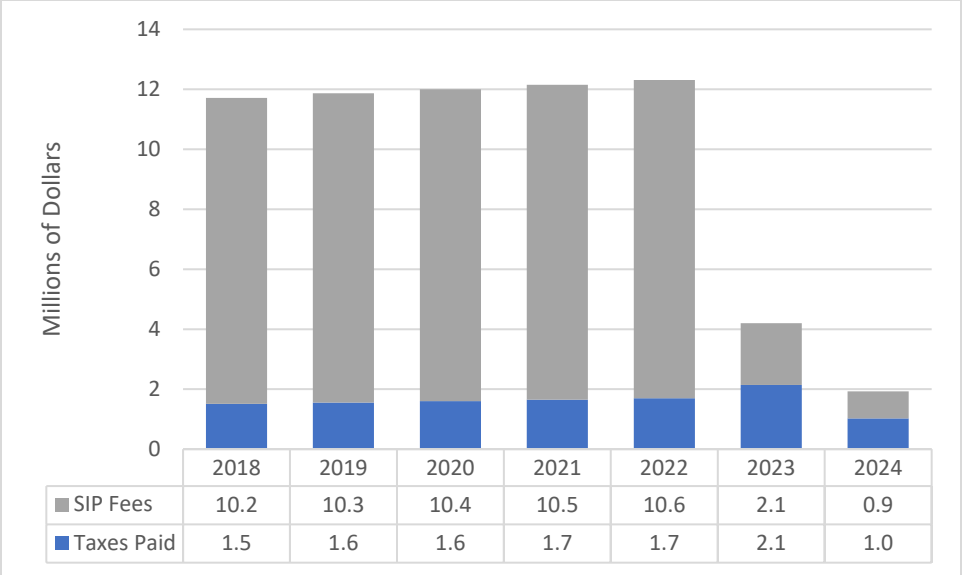


Note:
1. Data are by fiscal year (FY) and are identified in the chart by the second year (e.g., 2019 = FY 2018-19).
Source: Oregon Department of Revenue various years

Figure 2. Total Property Tax Revenues in Sherman County, FY 2019 to 2025

According to Business Oregon (2026), four renewable energy projects have entered into SIP agreements with Sherman County. These projects are the Klondike Wind Power III, the Hay Canyon & Star Point Wind Farms, and the Golden Hills Wind Farm, owned and operated by Avangrid, and the BCWF, owned and operated by PGE. Figure 3 shows the combined total taxes and SIP payments for these projects for 2018 to 2024.

From 2018 to 2022, these totals include three projects; Golden Hills Wind Farm appears for the first time in 2023. For 2018 to 2022, the annual SIP fees paid by these four projects exceeded the corresponding annual total property tax revenues in Sherman County, as indicated by the values in Figure 3 (SIP fees) and Figure 2 (total property tax revenues). Review of the Sherman County Adopted Budget report for fiscal year (FY) 2022 to 2023 indicates that SIP Funds received in Sherman County were allocated to the Sherman County School District, local cities, the Resident Incentive Program, Sherman County Museum, and scholarship committees (Sherman County 2022).



	2018	2019	2020	2021	2022	2023	2024
SIP Fees	10.2	10.3	10.4	10.5	10.6	2.1	0.9
Taxes Paid	1.5	1.6	1.6	1.7	1.7	2.1	1.0

Source: Business Oregon 2026

Figure 3. Property Tax Revenues and SIP Fees for Renewable Energy Projects in Sherman County, 2018 to 2024

In 2023, two of the projects, Klondike Wind Power III and the BCWF, both reached the end of their 15-year exemption periods. This is reflected in the drop in SIP fees shown in Figure 3 and the increase in property tax revenues in 2024 shown in Figure 2. From FY 2023 to FY 2024, property taxes imposed in Sherman County almost doubled, increasing from $10.1 million to $20.1 million (Figure 2). This increase was due to an increase in the assessed value for utilities, which increased from $408.5 million in FY 2023 to $1,062.7 million in FY 2024, accounting for 81 percent of total assessed value for all properties in Sherman County (Oregon Department of Revenue Various Years).

4.0 Fiscal Impacts

There are nine tax code areas in Sherman County. The Project is located in Tax Code Area 7-2, Rural Wasco, Rufus. Tax Code Area 7-2 includes six taxing districts with a combined levy or millage rate of 15.7369 in 2025-2026 (Table 1).

Table 1. Taxing Districts and Mill Rates for Sherman County Tax Code Area 7-2, 2024-2025

Taxing District	Mills
Sherman County	8.7141
Sherman Soil and Water Conservation District	0.2600
North Central ESD	2.0193
North Central Rural Fire Protection District	0.8452
Sherman County School District	3.4203
Sherman Health District	0.4780
Total	**15.7369**
Source: Sherman County 2025	

The following assessment estimates potential tax revenues under two Solar PILOT scenarios. The assessment is based on the following assumptions:

- Construction of the Project is expected to begin in Q3 of 2027 (mobilization) and continue through Q4 of 2028 for a duration of approximately 18 months. The Project will consist of a 200-MW PV solar facility and 1,000-MWh BESS, with a total estimated cost of $860 million.
- Estimates are for a 40-year operating life. Assessed values are assumed to depreciate over this period, with the Project assumed to depreciate to 20 percent of their original value by Year 25 following installation.
- The Project is located in Sherman County Tax Code Area 7-2. Base case estimates are based on the 2025-26 millage rate for Tax Code Area 7-2, which is assumed to remain constant over the 40-year analysis period.[2]
- The Solar PILOT assessment assumes that the Project would pay $5,500 per MW and represents the lower range of potential payments under this program. Estimates are provided for two scenarios. The first scenario assumes the Solar PILOT would extend for 15 years; the second scenario assumes it would extend for the full 20 years allowed under the program.

The results of this assessment are summarized in Table 2 and Figure 4, which show estimated payments to Sherman County under the two scenarios in 5-year increments for the assumed 40-year operating life of the Project. Estimates are 5-year totals, not annual averages. Total estimated payments to Sherman County under the two scenarios would range from approximately $80.5 million (Solar PILOT 20 year) to $103.7 million (Solar PILOT 15 year) over the assumed 40-year operating life of the Project (Table 2).

[2] Estimates are based on the full millage rate and do not account for the effects of compression, which would potentially reduce the amount of education funds paid to North Central ESD and the Sherman County School District.

Table 2. Estimated Property Tax Revenues by Solar PILOT Scenario ($ million)

Years[1]	Solar PILOT(15 year)[2]	Solar PILOT(20 year)[2]
1 to 5	5.5	5.5
6 to 10	5.5	5.5
11 to 15	5.5	5.5
16 to 20	28.7	5.5
21 to 25	17.9	17.9
26 to 30	13.5	13.5
31 to 35	13.5	13.5
36 to 40	13.5	13.5
Total	**103.7**	**80.5**

Notes:
1. Estimates are in millions of dollars and 5-year totals, not annual averages.
2. Solar PILOT estimates assume that the Project would pay $5,500 per MW for either 15 or 20 years. Per Oregon Senate Bill 154, payments could range from $5,500 to $7,000 per MW. Therefore, these estimates represent the lower range of potential payments under a Solar PILOT agreement.

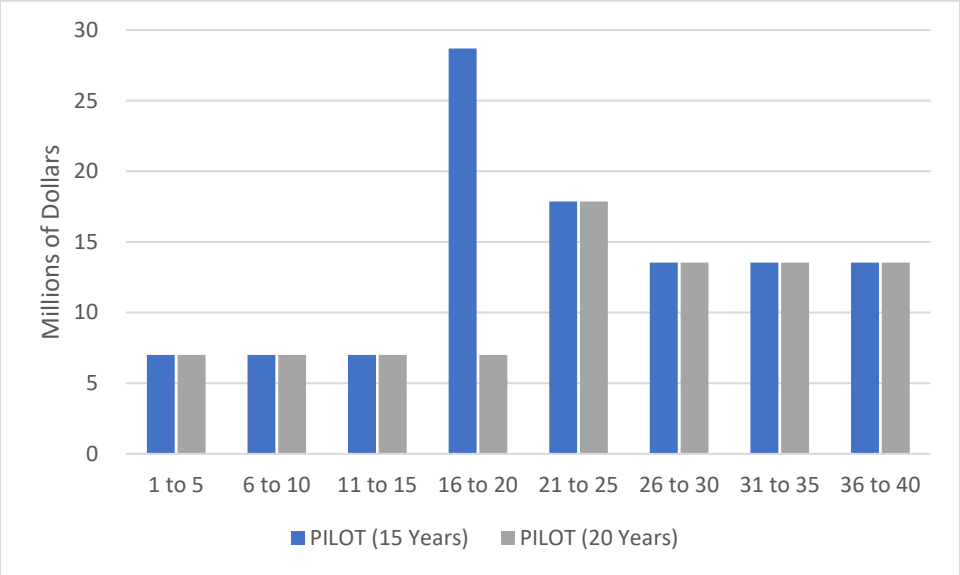


Figure 4. Estimated Property Tax Revenues by Scenario

Under both Solar PILOT scenarios, payments would be made to the taxing districts that comprise Tax Code Area 7-2 in accordance with their established levies (which combined make up the Area 7-2 millage rate) (see Table 1). Table 3 shows the anticipated distribution of the Project-related property tax revenues by scenario and taxing district based on the established levies for Tax Code Area 7-2. Sherman County would receive the largest share (55 percent) of the increased government revenues generated by the Project. Activities that are financed by general fund revenues in Sherman County include roads, law enforcement, public health, weed control, land use planning, assessment and taxation, district attorney, juvenile services, and general administration.

In addition, more than one-third (35 percent) of revenues would be distributed to education via the North Central ESD (13 percent) and the Sherman County School District (22 percent).[3]

Table 3. Estimated Property Tax Revenues by Scenario and Taxing District

Taxing District	Mills[2]	First Full Year of Operation[1]	40-Year Operating Life[1]	
		Solar PILOT[3]	Solar PILOT (15 year)	Solar PILOT (20 year)
Sherman County	8.7141	0.6	57.4	44.6
Sherman Soil and Water Conservation District	0.2600	0.0	1.7	1.3
North Central Education Special District	2.0193	0.1	13.3	10.3
North Central Rural Fire Protection District	0.8452	0.1	5.6	4.3
Sherman County School District	3.4203	0.2	22.5	17.5
Sherman Health District	0.4780	0.0	3.1	2.4
Total	**15.7369**	**1.1**	**103.7**	**80.5**

Notes:
1. Estimates are in millions of dollars.
2. Mills are the millage rates for the taxing districts in Tax Code Area 7-2 for 2025-26 (Sherman County 2025).
3. Estimates for the first full year of operation are the same for both Solar PILOT scenarios.

Other government units that would receive Project-related property tax revenues include the North Central Sherman Rural Fire Protection District, the Sherman County Soil and Water Conservation District, and the Sherman County Health District. Increased funding for the North Central Sherman Rural Fire Protection District could indirectly benefit agricultural activities through the provision of additional funds for wildland firefighting. Similarly, increased funding to the Sherman County Soil and Water Conservation District would help with conservation of natural resources and potentially benefit agricultural activities.

In all cases, Project-related property tax revenues would represent an important new source of funds that would otherwise not be available to these government units.

5.0 References

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ODOE (Oregon Department of Energy). 2021a. Memorandum Re: Reasons Exception Requests for Statewide Planning Goal 3, Agricultural Lands, for Proposed Solar Photovoltaic Energy Facilities. October 5.

[3] As noted elsewhere in this report, estimates are based on the full millage rate and do not account for the effects of compression, which could potentially reduce the amount of education funds paid to the North Central ESD and Sherman County School District.

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Sherman County. 2025. Sherman County Assessment Summary 2025-2026. Available October 1, 2025.

Attachment D-4. Surplus Interconnection Service Request for Biglow Canyon Wind Farm

APPENDIX 1 to LGIP
INTERCONNECTION REQUEST
FOR A LARGE GENERATING
FACILITY

1. The undersigned Interconnection Customer submits this request to interconnect its Large Generating Facility with Transmission Provider's Transmission System pursuant to Attachment L of Transmission Provider's Tariff.

2. This Interconnection Request is for (check one):
_____ A proposed new Large Generating Facility.
_____ An increase in the generating capacity of an existing Large Generating Facility
_____ Material Modification of an existing Large Generating Facility.
__X__ Surplus Interconnection Service (If checked, skip to #13 of this form)
_____ A Generating Facility Repower.
_____ A Generating Facility Replacement.

Name of the new or existing Large Generating Facility:
_____

If a Material Modification, describe proposed changes:
_____

The LGIA Contract # for the existing Large Generating Facility (Surplus requests, Repowers & Replacements only): _____

3. The type of interconnection service requested (check one):
_____ Energy Resource Interconnection Service (ERIS)
_____ Network Resource Interconnection Service (NRIS)

For NRIS, enter the eligible Network Transmission Load Servicing Entity:
_____

Note: When requesting a Repower or Replacement, NRIS is only available if the original LGIA was for NRIS.

4. _____Check here only if Interconnection Customer requesting NRIS also seeks to have its Generating Facility studied for ERIS.

5. Interconnection Customer provides the following information:

   a. Address and latitude/longitude of the proposed new Large Generating Facility site (to the extent known) or, in the case of an existing Generating

Facility, the name and latitude/longitude of the existing Generating Facility (Must provide the County and State of the proposed project.);

b. Enter megawatt of the electrical output of the proposed new Large Generating Facility or the amount of megawatt increase in the generating capacity and/or Interconnection Service level of an existing Generating Facility. Station service load, parasitic load, and charging load should be added together and entered as a negative number:

Season	Interconnection Service in MW (max/min)	Generating Facility Capacity (nameplate) in MW (max/min)	Degrees Celsius of Seasonal Rating
Spring			
Summer			
Fall			
Winter			

c. Ifapplicable, maximum summer at degrees C and winter at degrees C megawatt electrical charging of the new energy storage system or the amount of megawatt increase in the charging capacity of an existing Generating Facility;

d. General description of the equipment configuration;

e. Specify fuel type for proposed project;

£ Commercial Operation Date (Day, Month, and Year);

g. Name, job title, address, telephone number, and e-mail address of Interconnection Customer's contact person;

h. Approximate location of the proposed Point of Interconnection (optional); and

1. Generation Model and Performance Attestation set forth in Attachment A.

For all generation types a steady state model of the Large Generating Facility including equivalent plant-level model, equivalent collector system if applicable, step-up transformers, and generation tie line in either PowerWorld or GE PSLF format; and

j. Requested capacity (in MW) of Interconnection Service (other than the Generating Facility Capacity).

6. Non-refundable application fee as specified in the LGIP.

7. Evidence of Site Control as required by Transmission Provider is attached to this Interconnection Request.

8. Requested Point of Interconnection (optional):

9. Additional information regarding the significance/importance of requested Point of Interconnection for consideration by Transmission Provider (optional):

10. This Interconnection Request shall be submitted to the following email address:

    GI_ClusterStudies@bpa.gov

11. Transmission Provider Representative of Interconnection Customer to contact:

    Transmission Account Executive for (Interconnection Customer---------- ❑

    Bonneville Power Administration

    Transmission Sales - TSE/TPP2

    7500 NE 41st Street, Suite 130

    Vancouver, WA 98662

12. This Interconnection Request is submitted by:

    Name of Interconnection Customer: _____.

    By (signature): _____

    Name (type or print): _____

    Job Title: _____.

    Address: _____

    Phone Number: _____

Email Address: _____

Date: _____

13. **Surplus Interconnection Service Request only** (Please refer to Section 3.3.3 of the LGIP for a complete list of what to include when submitting a Surplus Interconnection Service Request):

Name of Surplus Interconnection Customer: Portland General Electric Company

By (signature): [redacted]

Name (type or print): [redacted]

Job Title: [redacted]

Address: [redacted]

Phone Number: [redacted]

Email Address: [redacted]

Date: [redacted]

Name of the existing Large Generating Facility pertaining to the Surplus Interconnection Service Request:

Biglow Canyon Wind farm

Name of the existing Interconnection Customer: Portland General Electric Company

LGIA Contract Number pertaining to the Surplus Interconnection Service Request:

Existing Generating Facility LGIA: [redacted]

The Existing Point of Interconnection in the LGIA: Biglow Canyon Substation

If the Surplus Interconnection Service Request is made by an affiliate of the existing Interconnection Customer the request must include a letter of intent to allow a specified portion of its Interconnection Service to be used by Surplus Interconnection Customer.

If the Surplus Interconnection Service Request is made by a non-affiliate, then the letter must also include a statement that the existing Interconnection Customer is waiving its priority right, on behalf of itself and any affiliate to utilize the Surplus Interconnection Service. See LGIP Section 3.3.3 (D) for details.

The type of Surplus Interconnection Service Requested (check one):
__X__ Energy Resource Interconnection Service (ERIS)

_____ Network Resource Interconnection Service (NRIS)

For NRIS, enter the eligible Network Transmission Load Servicing Entity:

Note: When requesting Surplus, NRIS is only available if the original LGIA was for NRIS.

_____Check here only if Surplus Interconnection Customer requesting NRIS also seeks to have its Generating Facility studied for ERIS.

If known, the address and latitude/longitude of surplus generating facility site:
45.614537, -120.635706

a. Enter megawatt of the electrical output of the proposed Surplus Large Generating Facility. Station service load, parasitic load, and charging load should be added together and entered as a negative number:

Season	Interconnection Service in MW (max/min)	Generating Facility Capacity (nameplate) in MW (max/min)	Degrees Celsius of Seasonal Rating
Spring	200	200 MW PV, 250 MW/4-hour BESS	N/A
Summer	200	200 MW PV, 250 MW/4-hour BESS	N/A
Fall	200	200 MW PV, 250 MW/4-hour BESS	N/A
Winter	200	200 MW PV, 250 MW/4-hour BESS	N/A

b. General description of the equipment configuration;

The project is a surplus request for Biglow Canyon Wind farm project connecting at Biglow Canyon substation. This is a hybrid project with 200 MW solar and 250 MW 4-hr BESS. [redacted]

C. Commercial Operation Date requested (Day, Month, and Year);

12/1/2028

d. Name, job title, address, telephone number, and e-mail address of Surplus Interconnection Customer's contact person;

[redacted]

e. Generation Model and Performance Attestation set forth in Attachment A.

For all generation types a steady state model of the Large Generating Facility including equivalent plant-level model, equivalent collector system if applicable, step-up transformers, and generation tie line in either PowerWorld or GE PSLF format; and

£ Requested capacity (in MW) of Interconnection Service (if lower than the Generating Facility Capacity).

200 MW PV + 250 MW BESS

14. Applicable deposit amount as specified in the LGIP.

15. Evidence of Site Control as specified in the LGIP (check one)
X___ Is attached to this Surplus Interconnection Request
_____ Will be provided at a later date in accordance with this LGIP

16. This Surplus Interconnection Request shall be submitted to the following email address:

GI_ClusterStudies@bpa.gov

17. Transmission Provider Representative of Surplus Interconnection Customer to contact:

Transmission Account Executive for (Interconnection Customer): Troy Simpson

Bonneville Power Administration

Transmission Sales – TSE/TPP2

7500 NE 41st Street, Suite 130

Vancouver, WA 98662

PGE_Biglow Opt Ph 2_BPA Surplus Interconnection Request Form_20260824

Final Audit Report 2026-08-24

Created:	2026-08-24
By:	Brian Nguyen (brian.nguyen@pgn.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAOUb5ocgyLEjmvEWwOk3P0qapfSgHgeqN

"PGE_Biglow Opt Ph 2_BPA Surplus Interconnection Request Form_20260824" History

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