

# **Exhibit U**

## **Availability of Public and Private Providers to Provide Services**

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**Carty Generating Station  
October 2026**

**Prepared for**



**Portland General Electric Company**

**Prepared by**



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## Acronyms and Abbreviations

|                          |                                                 |
|--------------------------|-------------------------------------------------|
| AADT                     | average annual daily traffic                    |
| AC                       | alternating current                             |
| ASC                      | Application for Site Certificate                |
| BESS                     | battery energy storage system                   |
| Certificate Holder / PGE | Portland General Electric Company               |
| CFR                      | Code of Federal Regulations                     |
| CGS / Facility           | Carty Generating Station                        |
| Council                  | Oregon Energy Facility Siting Council           |
| ESCP                     | Erosion and Sediment Control Plan               |
| FAA                      | Federal Aviation Administration                 |
| kV                       | kilovolt                                        |
| MW                       | megawatt                                        |
| NPDES                    | National Pollution Discharge Elimination System |
| NWSTF                    | Naval Weapons Systems Training Facility         |
| O&M                      | operations and maintenance                      |
| OAR                      | Oregon Administrative Rules                     |
| ODA                      | Oregon Department of Aviation                   |
| ODOE                     | Oregon Department of Energy                     |
| ODOT                     | Oregon Department of Transportation             |
| RFA                      | Request for Amendment                           |
| RV                       | recreational vehicle                            |
| TIA                      | traffic impact analysis                         |

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## 1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) is submitting a Request for Amendment (RFA) 4 to the Site Certificate for the Carty Generating Station (CGS or Facility). The Facility is located approximately 13 miles southwest of Boardman, in Morrow County, Oregon. As currently approved, the Facility is capable of generating up to 450 megawatts (MW) from the natural gas-fueled combined-cycle unit (Unit 1).

In RFA 4, the Certificate Holder is proposing photovoltaic solar energy generation with approximately 200 MW alternating current (AC) of nominal and average generating capacity and BESS with the capability of storing up to 200 MW AC. The overall CGS additions proposed with RFA 4 (including the BESS) are referred to throughout this request as the Carty Solar Farm with proposed RFA 4 changes. The solar generation is proposed in two separate solar areas referred to as the Northern Solar Area, located north of the Carty Reservoir, and the Southern Solar Area, located south of the reservoir [see Figure 2 in RFA 4's Division 27 document (Request for Amendment 4 for the Carty Generating Station)].

Exhibit U provides the information required by Oregon Administrative Rules (OAR) 345-021-0010(1)(u) in support of RFA 4. Analysis in this exhibit incorporates and/or relies on reference information, analysis, and findings found in the Application for Site Certificate (ASC), previous RFAs, and Oregon Department of Energy (ODOE) Final Orders to demonstrate that the Facility, as modified by RFA 4, continues to comply with applicable Site Certificate Conditions and the approval standard in OAR 345-022-0110.

## 2.0 Applicable Rules and Standards

Under OAR 345-022-0110, the Energy Facility Siting Council (Council) must find through appropriate study that:

*(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to the ability of public and private providers within the analysis area described in the project order to provide: sewers and sewage treatment, water, storm water drainage, solid waste management, housing, traffic safety, police and fire protection, health care and schools.*

To demonstrate compliance with this standard, and in accordance with OAR 345-021-0010(1)(u), Exhibit U must include information about significant potential adverse impacts resulting from the construction and operation of the Carty Solar Farm with proposed RFA 4 changes on the ability of public and private providers in the analysis area to provide the services listed in the standard. Exhibit U demonstrates that the Council may rely on its earlier findings along with the supplemental information provided here to conclude that the construction and operation of the

Facility, as modified by RFA 4, taking into account mitigation, is not likely to result in significant adverse impacts to the provision of the public services listed in OAR 345-022-0110.

### 3.0 Analysis Area

In accordance with OAR 345-001-0010(35)(b), the analysis area for public services is the area within and extending 10 miles from the Amended Site Boundary (Figure U-1). The Amended Site Boundary is defined in detail in Section 4.1.1.2 of the RFA 4's Division 27 document (Request for Amendment 4 for the Carty Generating Station).

## 4.0 Analysis

### 4.1 Methods

The following analysis incorporates information, analysis, and findings from the Facility ASC, previous RFAs, and data from federal, state, and local government agencies. Local public service providers were also contacted directly for data on potentially affected public services. The potential effects of the Carty Solar Farm with proposed RFA 4 changes were evaluated with respect to the ability of public and private providers within the analysis area to provide sewers and sewage treatment, water, stormwater drainage, solid waste management, housing, traffic safety, police and fire protection, health care, and schools.

### 4.2 Assumptions Used to Evaluate Potential Impacts – OAR 345-001-0010(1)(u)(A)

*OAR 345-021-0010(1)(u) Information about significant potential adverse impacts of construction and operation of the proposed facility on the ability of public and private providers in the analysis area to provide the services listed in OAR 345-022-0110, providing evidence to support a finding by the Council as required by OAR 345-022-0110. The applicant must include:*

*OAR 345-021-0010(1)(u)(A) The important assumptions the applicant used to evaluate potential impacts;*

Exhibit U provides key assumptions and information used to evaluate potential impacts of the Carty Solar Farm with proposed RFA 4 changes on public and private providers. It is expected that the types of impacts to public services anticipated will be similar to the impacts described in RFA 1.

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

The analysis area includes Morrow County and a very small portion of Gilliam County in Oregon, and Klickitat and Benton counties in Washington. Due to the location of the Facility, the Certificate

Holder expects that within the analysis area, most personnel will use public and private service providers in northern Morrow County (i.e., in Boardman or Irrigon); usage of service providers in Benton and Franklin counties is also anticipated (e.g., housing in the Tri-Cities area). PGE expects some personnel to also use providers beyond the analysis area, including in Umatilla County, Oregon (e.g., hospital and housing in Hermiston). This assumption is incorporated into the applicable public service provider analyses, i.e., housing, traffic, and health care.

#### **4.2.1 Construction**

PGE expects an average of 31 workers on-site during the 24-month construction period for the Carty Solar Farm with proposed RFA 4 changes, with a peak number of 188 workers while multiple disciplines of contractors complete their work simultaneously during periods of the highest activity (approximately 6 to 12 months during construction). Most construction workers will be employees of construction and equipment manufacturing companies under contract to the Certificate Holder.

PGE anticipates that approximately 30 percent of the construction workforce will be local residents within 70 miles (1-hour duration) commuting distance to the Facility. Very few, if any, of the non-local workers employed during the construction phase of the Facility will be expected to permanently relocate to the area. The percentage of the construction workforce hired locally will depend on the availability of workers with appropriate skills. The size of the skilled local workforce is continually growing as more solar farms are built in eastern Oregon, so the percentage of local construction workers may be higher than estimated.

Workers in some positions, such as construction foremen and inspectors, will be employed for the entire duration of construction, but many workers will be employed for 6 to 12 months and therefore will not be expected to bring families with them. The Certificate Holder assumes very few workers will relocate their families.

As the Certificate Holder assumes that because most construction workers will not be in the area for more than 6 to 12 months, housing for most construction workers will primarily be provided by hotels, motels, temporary housing, and recreational vehicle (RV) parks within a commutable distance to the Facility (70 miles, or 1-hour commute duration).

#### **4.2.2 Operations**

The Certificate Holder expects that the Carty Solar Farm with proposed RFA 4 changes will require up to 12 personnel for daily maintenance activities during operations over the 25-year lifespan of the Carty Solar Farm with proposed RFA 4 changes. The operations and maintenance (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. A household size of 3.0 is conservatively assumed per employee, thus a total of 36 new permanent residents could be added to the local population. It is assumed that these workers will live locally. The Certificate Holder may also rely on O&M staff from

its existing operating portion of the Facility to provide operational support for the Carty Solar Farm with proposed RFA 4 changes.

### **4.2.3 Decommissioning**

Decommissioning employment will be temporary and similar to the construction of the Carty Solar Farm with proposed RFA 4 changes. Decommissioning is estimated to require a similar duration as construction, i.e., up to 24 months.

## **4.3 Affected Public and Private Service Providers – OAR 345-001-0010(1)(u)(B)**

*OAR 345-021-0010(1)(u)(B) Identification of the public and private providers in the analysis area that would likely be affected;*

### **4.3.1 Affected Counties, Cities, and Communities**

Table U-1 presents historical population estimates for communities in Morrow, Gilliam, Benton, and Klickitat counties within the analysis area. Communities within 10 miles of the Facility were analyzed; Boardman is the only Census Designated Place found within the analysis area. Boardman had a 2024 population of approximately 4,064 people, 33 percent of Morrow County’s total population.

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

| Location                                                   | Population     |                | 2020 -2024      |                |
|------------------------------------------------------------|----------------|----------------|-----------------|----------------|
|                                                            | Census 2020    | Census 2024    | Absolute Change | Percent Change |
| OREGON                                                     | 4,237,256      | 4,254,293      | 17,037          | 0.4            |
| <b>Morrow County</b>                                       | <b>12,186</b>  | <b>12,300</b>  | <b>114</b>      | <b>0.9</b>     |
| Boardman                                                   | 3,828          | 4,064          | 236             | 6.2            |
| <b>Gilliam County</b>                                      | <b>1,995</b>   | <b>1,971</b>   | <b>-24</b>      | <b>-1.2</b>    |
| WASHINGTON                                                 | 7,705,281      | 7,816,116      | 110,835         | 1.4            |
| <b>Benton County</b>                                       | <b>206,873</b> | <b>212,905</b> | <b>6,032</b>    | <b>2.9</b>     |
| <b>Klickitat County</b>                                    | <b>22,735</b>  | <b>23,411</b>  | <b>676</b>      | <b>3.0</b>     |
| Source: U.S. Census Bureau 2020a, U.S. Census Bureau 2024. |                |                |                 |                |

All communities within a commutable distance (70 miles) are considered in the housing analysis (see Sections 4.3.7 and 4.4.5). According to the most recent available U.S. Census Bureau (2020b) residence to workplace data for 2016 to 2020, nearly 74 percent of Morrow County residents work within Morrow County (3,486 commuters per day). Morrow County receives 2,407 Umatilla County, Oregon, commuters per day, 307 Benton County, Washington, commuters per day, 185 Franklin

County, Washington, commuters per day, 59 Gilliam County, Oregon, commuters per day, and 45 Clackamas County, Oregon, commuters per day. The remaining 187 Morrow County commuters travel from multiple other, more distant counties.

### **4.3.2 Public and Private Service Providers**

Table U-2 identifies the public and private service providers in and near the analysis area that may be affected by construction of the Carty Solar Farm with proposed RFA 4 changes. The analysis area includes Morrow County in Oregon, as well as a small portion of eastern Gilliam County in Oregon and southern Klickitat and Benton counties in Washington. PGE does not expect any providers in the Gilliam County portion of the analysis area to be affected. PGE does expect that some providers in Umatilla County in Oregon (outside of the analysis area) may be affected. An analysis of different services and providers necessary for construction and operation of the Carty Solar Farm with proposed RFA 4 changes are identified in the following sections.

**Table U-2. Public and Private Service Providers**

| <b>Service</b>              | <b>Service Provider Detail</b>                                  | <b>Location</b>                                                                                                                                                                                             |
|-----------------------------|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sewers and Sewage Treatment | Various providers: portable toilets and sewage disposal         | Hermiston or Boardman, Oregon                                                                                                                                                                               |
| Water                       | No service provider is required                                 | N/A                                                                                                                                                                                                         |
| Stormwater Drainage         | No service provider is required                                 | N/A                                                                                                                                                                                                         |
| Solid Waste Management      | Finley Buttes Landfill: non-hazardous and some hazardous waste  | Boardman, Oregon                                                                                                                                                                                            |
|                             | Columbia Ridge Landfill: non-hazardous and some hazardous waste | Arlington, Oregon                                                                                                                                                                                           |
| Housing                     | Approximately 3,492 vacant units                                | Predominately the following locations:<br>Boardman, Oregon<br>Pendleton, Oregon<br>Prosser, Washington<br>Walla Walla, Washington<br>Tri-Cities, Washington<br>See Section 4.3.7 for full list of locations |
|                             | Approximately 95 hotels, motels, and recreation vehicle parks   | Boardman, Oregon<br>Hermiston, Oregon<br>Pendleton, Oregon<br>Tri-Cities, Washington                                                                                                                        |
| Traffic                     | Oregon Department of Transportation                             | Salem, Oregon                                                                                                                                                                                               |

| <b>Service</b>             | <b>Service Provider Detail</b>                                                              | <b>Location</b>                                      |
|----------------------------|---------------------------------------------------------------------------------------------|------------------------------------------------------|
|                            | Morrow County Public Works Department                                                       | Lexington, Oregon                                    |
| Police and Fire Protection | Morrow County Sheriff's Office (primary law enforcement provider for the Facility location) | Heppner, Oregon                                      |
|                            | Oregon State Police (secondary law enforcement provider for the Facility location)          | Arlington, Heppner, Hermiston, and Pendleton, Oregon |
|                            | Boardman Police Department (Backup law enforcement provider)                                | Boardman, Oregon                                     |
|                            | Boardman Fire Rescue District                                                               | Boardman, Oregon                                     |
| Health Care                | Irrigon Medical Clinic (not Trauma rated)                                                   | Irrigon, Oregon                                      |
|                            | Good Shepherd Medical Center (Level III Trauma Center)                                      | Hermiston, Oregon                                    |
|                            | Trios Southridge Hospital (Level III Trauma Center)                                         | Kennewick, Washington                                |
|                            | Kadlec Regional Medical Center (Level III Trauma Center)                                    | Richland, Washington                                 |
|                            | Legacy Emanuel Medical Center (Level I Trauma Center)                                       | Portland, Oregon                                     |
|                            | Oregon Health and Science University Hospital (Level I Trauma Center)                       | Portland, Oregon                                     |
|                            | Morrow County Health District's Emergency Medical Services (Emergency medical transport)    | Boardman and Irrigon, Oregon                         |
| Schools                    | Sam Boardman Elementary School                                                              | Boardman, Oregon                                     |
|                            | Windy River Elementary School                                                               | Boardman, Oregon                                     |
|                            | Riverside Junior/Senior High School                                                         | Boardman, Oregon                                     |

### ***4.3.3 Sewers and Sewage Treatment***

In the rural area surrounding the Facility, there are no developed sewer systems that will be impacted by construction or operation of the Carty Solar Farm with proposed RFA 4 changes. The nearest developed sewer systems are located approximately 9 miles away from the Amended Site Boundary in the town of Boardman, Oregon; other cities' sewer systems are farther away. As explained in Exhibit O, portable toilets will be used during construction; these will be provided and serviced (including off-site disposal of waste) by a private sanitation service provider. During operation of the Carty Solar Farm with proposed RFA 4 changes, PGE's staff will make use of sanitary facilities at the proposed (O&M) building, which will send sewage to the existing septic system. During operations, if there are numerous workers at the Facility for multiple days in a row, a portable toilet may be temporarily installed.

#### **4.3.4 Water**

In the rural area surrounding the Facility, there are no developed water systems that will be impacted by construction or operation of the Carty Solar Farm with proposed RFA 4 changes. The nearest developed water systems are located in the city of Boardman, approximately 9 miles from the Amended Site Boundary; other cities' water systems are farther away.

PGE expects that approximately 84 million gallons of water will be required for construction of the Carty Solar Farm with proposed RFA 4 changes. As discussed in Exhibit O, all non-potable water used for construction and operations will be withdrawn from the Carty Reservoir, which is owned and operated by PGE. Potable water will be sourced from the Facility's existing potable water system, which in turn is sourced from an existing Boeing well located 170 feet south of the Carty Generating Station Unit 1 building. During construction, potable water will be obtained from a temporary tie in with the existing Boeing well located 170 feet south of the Carty Generating Station Unit 1 building or from a bottled water vendor (per Site Certificate Condition 10.23). During operation, potable water will be obtained within the proposed O&M building with a connection to the Carty potable water system via the existing Boeing well. For water rights information and other details, see Exhibit O of this RFA.

#### **4.3.5 Stormwater Drainage**

In the rural area surrounding the proposed Facility, stormwater infrastructure is limited to minimal facilities associated with public roads maintained by Morrow County. The nearest developed stormwater drainage facilities in the vicinity of the Facility are located within the Boardman city limits; however, the Amended Site Boundary is approximately 9 miles from Boardman and the Carty Solar Farm with proposed RFA 4 changes will not connect to or otherwise impact the city's stormwater system.

#### **4.3.6 Solid Waste Management**

Morrow County provides solid waste disposal services through agreements with private providers. It is assumed that solid waste developed during construction, operation, and decommissioning of the Carty Solar Farm with proposed RFA 4 changes will be transported to landfills through agreements with local private disposal services. The closest landfill to the Facility is the Finley Buttes Landfill (9.8 miles east of the Amended Site Boundary) and the Columbia Ridge Landfill (18.5 miles northwest of the Amended Site Boundary). Records of correspondence with the landfills have been provided in Attachment U-1.

Morrow County has adopted a Solid Waste Management Ordinance that addresses solid waste disposal and recycling in the county. One of the purposes of this ordinance is to "[provide] the opportunity to recycle as part of the overall solid waste plan," and refers in turn to Oregon's reuse and recycling requirements. The majority of the ordinance relates to licensing of waste disposal sites and waste collection franchises and recycling franchises. The ordinance obligates the waste

and recycling franchisees to maintain records of amounts of waste collected or received, and amounts and types of waste recycled, consistent with reporting requirements of the Oregon Department of Environmental Quality. PGE will continue to coordinate with waste and recycling franchisees servicing the Facility and maintain adherence to the ordinance (Site Certificate Condition 6.24).

#### ***4.3.7 Housing***

Construction is anticipated to last approximately 24 months. Based on PGE's experience during construction of the Carty Generating Station Unit 1 building from 2014 to 2016, PGE anticipates that much of the construction personnel will be permanent residents or temporary residents who commute from the Tri-Cities area in Benton and Franklin counties, Washington. For this analysis, it is assumed that temporary housing could be required for up to 132 new households during the peak construction period and about 22 new households on average during the 24-month construction period. This is assuming 70 percent of construction staff will not be existing residents and will migrate to the area during construction. Additionally, permanent housing for roughly 12 new households, including workers and their families (based on a household size of 3.0), may be required during operations.

Varying degrees of housing options are provided in incorporated and unincorporated communities within the analysis area, and within a commutable distance from the Facility (70 miles) outside of the analysis area. Typical housing options for temporary workers include hotels or motels, apartments, short-term rental homes, RV parks, and public or private campgrounds. Note that no RV usage is proposed at the Facility itself but rather at existing RV parks and campgrounds. There are over 70 hotels/motels within commutable distance (70 miles, or 1 hour of travel) to the Facility (Hotels.com 2026). These include five hotels/motels in Boardman, Oregon, around 10 hotels/motels near Hermiston, Oregon, and approximately 15 hotels/motels in Pendleton, Oregon. There are approximately 40 hotels/motels within the Tri-Cities area, Washington. In addition, approximately 25 recreational vehicle parks are available within commutable distance of the Facility in northern Morrow and Umatilla counties, Oregon, and the Tri-Cities, Washington (RV Life Campgrounds 2026).

The Certificate Holder assumes that most construction workers will be in the area for approximately 6 to 12 months, and that the housing for those workers will primarily be provided by hotels and RV parks.

Some construction workers, particularly those employed for the entire duration of construction, may rent a house or apartment during construction of the Carty Solar Farm with proposed RFA 4 changes. Table U-3 presents housing supply and availability data for counties and communities within a commutable distance. The estimated number of vacant rental units is calculated as a percentage of total vacant housing units; that percentage is based on the ratio of renter-occupied dwellings to owner-occupied dwellings. Using this method, an estimated 3,492 housing units were available for rent in communities within a commutable distance. Housing vacancy rates for 2024 ranged from zero percent in several communities to 36.8 percent in Weston. The 2024 seven-

Oregon county average rental vacancy rate of approximately 6.9 percent is higher than the state of Oregon's rental vacancy rate of 4.2 percent; the 2024 six-Washington county average rental vacancy rate of approximately 4.6 percent is higher than the state of Washington's rental vacancy rate of 4.5 percent. Eleven of the 55 communities experience vacancy rates greater than 5 percent. If workers migrate from the larger Tri-Cities area of Washington (i.e., Kennewick, Pasco, and Richland), it is expected that approximately 1,500 rental units may be vacant in that area.

**Table U-3. Available Housing Estimates**

| <b>Geographic Area</b> | <b>Total Housing Units (2024)</b> | <b>Vacant Housing Units (2024)</b> | <b>Of Occupied Housing, Percentage Occupied by Renter (2024)</b> | <b>Estimated Number of Vacant Rental Units (2024)</b> | <b>Rental Vacancy Percentage (2024)</b> |
|------------------------|-----------------------------------|------------------------------------|------------------------------------------------------------------|-------------------------------------------------------|-----------------------------------------|
| <b>OREGON</b>          | <b>1,857,992</b>                  | <b>139,570</b>                     | <b>36.7</b>                                                      | <b>27,639</b>                                         | <b>4.2</b>                              |
| <b>Morrow County</b>   | <b>4,912</b>                      | <b>586</b>                         | <b>28.4</b>                                                      | <b>161</b>                                            | <b>11.6</b>                             |
| Boardman               | 1,437                             | 193                                | 41.8                                                             | 152                                                   | 22.6                                    |
| Heppner                | 568                               | 75                                 | 50.1                                                             | 9                                                     | 3.5                                     |
| Ione                   | 202                               | 19                                 | 23.0                                                             | 0                                                     | 0.0                                     |
| Irrigon                | 777                               | 22                                 | 17.1                                                             | 0                                                     | 0.0                                     |
| Lexington              | 54                                | 9                                  | 6.7                                                              | 0                                                     | 0.0                                     |
| <b>Umatilla County</b> | <b>32,199</b>                     | <b>3,492</b>                       | <b>32.1</b>                                                      | <b>464</b>                                            | <b>4.8</b>                              |
| Echo                   | 197                               | 28                                 | 26.6                                                             | 0                                                     | 0.0                                     |
| Hermiston              | 7,014                             | 450                                | 38.3                                                             | 83                                                    | 3.2                                     |
| Meacham                | 69                                | 53                                 | 0.0                                                              | 0                                                     | 0.0                                     |
| Milton-Freewater       | 2,862                             | 410                                | 52.0                                                             | 55                                                    | 4.1                                     |
| Pendleton              | 7,016                             | 759                                | 43.5                                                             | 269                                                   | 9.0                                     |
| Pilot Rock             | 657                               | 83                                 | 15.7                                                             | 0                                                     | 0.0                                     |
| Stanfield              | 854                               | 39                                 | 22.6                                                             | 0                                                     | 0.0                                     |
| Ukiah                  | 107                               | 34                                 | 17.8                                                             | 0                                                     | 0.0                                     |
| Umapine                | 269                               | 0                                  | 35.3                                                             | 0                                                     | 0.0                                     |
| Umatilla               | 2,313                             | 112                                | 30.0                                                             | 0                                                     | 0.0                                     |
| Weston                 | 240                               | 56                                 | 6.5                                                              | 7                                                     | 36.8                                    |
| <b>Gilliam County</b>  | <b>1,138</b>                      | <b>263</b>                         | <b>25.9</b>                                                      | <b>33</b>                                             | <b>12.7</b>                             |
| Arlington              | 285                               | 11                                 | 25.9                                                             | 0                                                     | 0.0                                     |

**EXHIBIT U: AVAILABILITY OF PUBLIC AND PRIVATE  
PROVIDERS TO PROVIDE SERVICES**

| <b>Geographic Area</b> | <b>Total Housing Units (2024)</b> | <b>Vacant Housing Units (2024)</b> | <b>Of Occupied Housing, Percentage Occupied by Renter (2024)</b> | <b>Estimated Number of Vacant Rental Units (2024)</b> | <b>Rental Vacancy Percentage (2024)</b> |
|------------------------|-----------------------------------|------------------------------------|------------------------------------------------------------------|-------------------------------------------------------|-----------------------------------------|
| Condon                 | 470                               | 142                                | 15.9                                                             | 21                                                    | 28.8                                    |
| Lonerock               | 26                                | 6                                  | 0.0                                                              | 0                                                     | 0.0                                     |
| <b>Grant County</b>    | <b>4,157</b>                      | <b>713</b>                         | <b>23.3</b>                                                      | <b>61</b>                                             | <b>7.1</b>                              |
| Monument               | 159                               | 20                                 | 25.2                                                             | 0                                                     | 0.0                                     |
| <b>Wheeler County</b>  | <b>908</b>                        | <b>205</b>                         | <b>28.2</b>                                                      | <b>11</b>                                             | <b>5.3</b>                              |
| Fossil                 | 256                               | 8                                  | 20.2                                                             | 0                                                     | 0.0                                     |
| Spray                  | 63                                | 20                                 | 14.0                                                             | 0                                                     | 0.0                                     |
| <b>Sherman County</b>  | <b>969</b>                        | <b>165</b>                         | <b>34.1</b>                                                      | <b>12</b>                                             | <b>4.2</b>                              |
| Biggs Junction         | 0                                 | 0                                  | 0.0                                                              | 0                                                     | 0.0                                     |
| Grass Valley           | 142                               | 35                                 | 37.4                                                             | 10                                                    | 20.0                                    |
| Moro                   | 170                               | 20                                 | 35.3                                                             | 0                                                     | 0.0                                     |
| Wasco                  | 222                               | 24                                 | 25.8                                                             | 0                                                     | 0.0                                     |
| <b>Wasco County</b>    | <b>12,198</b>                     | <b>1,635</b>                       | <b>32.5</b>                                                      | <b>88</b>                                             | <b>2.5</b>                              |
| Antelope               | 41                                | 15                                 | 23.1                                                             | 0                                                     | 0.0                                     |
| Dufur                  | 381                               | 31                                 | 21.7                                                             | 0                                                     | 0.0                                     |
| Maupin                 | 344                               | 133                                | 23.7                                                             | 0                                                     | 0.0                                     |
| Shaniko                | 18                                | 8                                  | 30.0                                                             | 0                                                     | 0.0                                     |
| The Dalles             | 6,964                             | 439                                | 36.8                                                             | 27                                                    | 1.1                                     |
| Tygh Valley            | 88                                | 14                                 | 74.3                                                             | 0                                                     | 0.0                                     |
| <b>WASHINGTON</b>      | <b>3,306,620</b>                  | <b>241,800</b>                     | <b>36.2</b>                                                      | <b>52,306</b>                                         | <b>4.5</b>                              |
| <b>Benton County</b>   | <b>83,101</b>                     | <b>5,055</b>                       | <b>32.4</b>                                                      | <b>1,330</b>                                          | <b>5.0</b>                              |
| Benton City            | 1,405                             | 25                                 | 27.5                                                             | 0                                                     | 0.0                                     |
| Finley                 | 1,978                             | 68                                 | 17.0                                                             | 0                                                     | 0.0                                     |
| Kennewick              | 33,254                            | 1,882                              | 38.7                                                             | 639                                                   | 5.0                                     |
| Prosser                | 2,437                             | 204                                | 45.6                                                             | 107                                                   | 9.5                                     |
| Richland               | 26,791                            | 1,575                              | 35.6                                                             | 512                                                   | 5.4                                     |
| West Richland          | 6,244                             | 354                                | 16.6                                                             | 0                                                     | 0.0                                     |

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| <b>Geographic Area</b>          | <b>Total Housing Units (2024)</b> | <b>Vacant Housing Units (2024)</b> | <b>Of Occupied Housing, Percentage Occupied by Renter (2024)</b> | <b>Estimated Number of Vacant Rental Units (2024)</b> | <b>Rental Vacancy Percentage (2024)</b> |
|---------------------------------|-----------------------------------|------------------------------------|------------------------------------------------------------------|-------------------------------------------------------|-----------------------------------------|
| <b>Klickitat County</b>         | <b>10,945</b>                     | <b>1,073</b>                       | <b>23.3</b>                                                      | <b>116</b>                                            | <b>4.8</b>                              |
| Bickleton                       | 44                                | 9                                  | 20.0                                                             | 0                                                     | 0.0                                     |
| Goldendale                      | 1,911                             | 244                                | 48.2                                                             | 61                                                    | 7.1                                     |
| <b>Yakima County</b>            | <b>92,432</b>                     | <b>4,724</b>                       | <b>38.2</b>                                                      | <b>823</b>                                            | <b>2.4</b>                              |
| Grandview                       | 3,609                             | 158                                | 44.5                                                             | 61                                                    | 3.8                                     |
| Granger                         | 888                               | 14                                 | 45.9                                                             | 14                                                    | 3.4                                     |
| Mabton                          | 603                               | 20                                 | 43.7                                                             | 0                                                     | 0.0                                     |
| Sunnyside                       | 4,627                             | 187                                | 45.0                                                             | 58                                                    | 2.8                                     |
| Toppenish                       | 2,504                             | 57                                 | 44.6                                                             | 9                                                     | 0.8                                     |
| Union Gap                       | 2,341                             | 99                                 | 38.3                                                             | 57                                                    | 6.2                                     |
| Wapato                          | 1,337                             | 71                                 | 47.6                                                             | 32                                                    | 5.0                                     |
| White Swan                      | 155                               | 24                                 | 43.5                                                             | 0                                                     | 0.0                                     |
| Yakima                          | 37,467                            | 1,741                              | 46.2                                                             | 440                                                   | 2.6                                     |
| <b>Walla Walla County</b>       | <b>25,422</b>                     | <b>1,975</b>                       | <b>35.0</b>                                                      | <b>724</b>                                            | <b>8.1</b>                              |
| Touchet                         | 194                               | 11                                 | 20.2                                                             | 0                                                     | 0.0                                     |
| Walla Walla                     | 14,237                            | 1,153                              | 42.9                                                             | 522                                                   | 8.5                                     |
| <b>Franklin County</b>          | <b>31,183</b>                     | <b>1,293</b>                       | <b>29.0</b>                                                      | <b>371</b>                                            | <b>4.1</b>                              |
| Basin City                      | 268                               | 0                                  | 24.6                                                             | 0                                                     | 0.0                                     |
| Pasco                           | 25,678                            | 930                                | 29.1                                                             | 347                                                   | 4.6                                     |
| West Pasco                      | 588                               | 183                                | 0.0                                                              | 0                                                     | 0.0                                     |
| <b>Grant County</b>             | <b>40,214</b>                     | <b>4,816</b>                       | <b>33.7</b>                                                      | <b>395</b>                                            | <b>3.2</b>                              |
| Desert Aire                     | 1,357                             | 291                                | 17.5                                                             | 0                                                     | 0.0                                     |
| Source: U.S. Census Bureau 2024 |                                   |                                    |                                                                  |                                                       |                                         |

### **4.3.8 Traffic**

Roads within the primary transportation route are serviced by the Oregon Department of Transportation (ODOT; Interstate 84 [I-84] and a portion of Interstate 82 [I-82]) and the Morrow

County Public Works Department (Tower Road and other local roads). It is anticipated based on the assessment completed in this section and Section 4.4.6 that roads within the primary transportation route are of sufficient quality to accommodate the temporary increase in construction traffic, and that no road upgrades will be required outside of the Amended Site Boundary. The primary transportation routes utilize a commutable distance assumption of 70 miles, or 1 hour of travel.

#### **4.3.8.1      *Primary Transportation Routes***

Privately owned vehicles will transport workers to and from the Carty Solar Farm with proposed RFA 4 changes. Most construction personnel are expected to originate from the Tri-Cities, Washington, and will access the Facility by traveling south on I-82 and then west on I-84 until reaching Tower Road (located approximately 5 miles west of the city of Boardman, Oregon; Figure U-1). Workers will travel south on Tower Road for approximately 10 miles until reaching the Facility entrance near the Carty Generating Station Unit 1 building.

Heavy-duty trucks will be used to carry gravel, concrete, and materials for solar modules. Light-duty trucks will mostly be used to deliver electrical equipment and water. Primary transportation for construction trucks will likely begin near Portland, Oregon. Trucks will access the Facility by traveling east on I-84 until reaching Tower Road. From Tower Road, trucks will travel south for approximately 10 miles until entering the Facility on Tower Road. From there, construction areas will be accessed via existing access roads within the Amended Site Boundary. New access roads are only needed within the perimeter fence for each of the two solar areas.

#### **4.3.8.2      *Traffic Volumes***

Table U-4 provides traffic volumes for the expected transportation routes to the Facility. State highway volumes were published in the 2021 through 2025 Traffic Volume Tables (ODOT 2021, ODOT 2022, ODOT 2023, ODOT 2024, ODOT 2025a). Table U-4 shows the average annual daily traffic (AADT) volumes for the most recent 5 years of data available at various milepost locations along the transportation routes. For Tower Road, there was only one year of AADT data available (2024) via ODOT’s TransGIS Data Viewer (ODOT 2026), provided at the end of Table U-4.

**Table U-4. Transportation Route Average Annual Daily Traffic Volumes**

| <b>Highway<sup>1</sup></b> | <b>Location</b>                                    | <b>Milepost</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>2025</b> | <b>Average<br/>Percent<br/>Change<br/>2021-<br/>2025</b> |
|----------------------------|----------------------------------------------------|-----------------|-------------|-------------|-------------|-------------|-------------|----------------------------------------------------------|
| <b>I-82</b>                |                                                    |                 |             |             |             |             |             |                                                          |
| I-82 (No. 70)              | South of Oregon Washington State Line [0.58 miles] | 0.58            | 24,536      | 24,824      | 25,539      | 25,753      | 26,674      | 2.1%                                                     |

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| <b>Highway<sup>1</sup></b>            | <b>Location</b>                                       | <b>Milepost</b> | <b>2021</b> | <b>2022</b> | <b>2023</b> | <b>2024</b> | <b>2025</b> | <b>Average<br/>Percent<br/>Change<br/>2021-<br/>2025</b> |
|---------------------------------------|-------------------------------------------------------|-----------------|-------------|-------------|-------------|-------------|-------------|----------------------------------------------------------|
| I-82 (No. 70)                         | South of Columbia River Highway (US-730) [0.30 miles] | 1.3             | 18,227      | 17,928      | 16,621      | 16,751      | 17,203      | -1.4%                                                    |
| I-82 (No. 70)                         | South of Powerline Road [0.30 miles]                  | 5.13            | 17,666      | 17,317      | 16,149      | 16,278      | 16,718      | -1.3%                                                    |
| I-82 (No. 70)                         | North of Old Oregon Trail Highway (I-84)              | 10.15           | 19,584      | 18,934      | 17,648      | 17,787      | 18,267      | -1.7%                                                    |
| <b>I-84</b>                           |                                                       |                 |             |             |             |             |             |                                                          |
| I-84 (Columbia River Highway No. 002) | East of Heppner Highway No. 52 (OR-74) [0.43 mile]    | 147.78          | 14,286      | 14,152      | 13,943      | 13,959      | 14,162      | -0.2%                                                    |
| I-84 (Columbia River Highway No. 002) | West of Tower Road Interchange                        | 159.00          | 14,460      | 14,324      | 14,333      | 14,388      | 14,776      | 0.6%                                                     |
| I-84 (Columbia River Highway No. 002) | West of Boardman Interchange [0.30 miles]             | 163.86          | 16,147      | 15,997      | 16,032      | 15,830      | 16,257      | 0.2%                                                     |
| I-84 (Columbia River Highway No. 002) | West of Port Morrow Interchange [0.30 miles]          | 165.46          | 18,137      | 17,966      | 18,664      | 18,750      | 19,256      | 1.5%                                                     |

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| Highway <sup>1</sup>                              | Location                                                                                               | Milepost | 2021   | 2022   | 2023   | 2024   | 2025   | Average<br>Percent<br>Change<br>2021-<br>2025 |
|---------------------------------------------------|--------------------------------------------------------------------------------------------------------|----------|--------|--------|--------|--------|--------|-----------------------------------------------|
| I-84<br>(Columbia<br>River<br>Highway<br>No. 002) | West of Old<br>Oregon<br>Trail<br>Interchange<br>(I-84) [0.40<br>miles]                                | 167.18   | 21,116 | 20,915 | 21,417 | 21,773 | 22,361 | 1.5%                                          |
| I-84<br>(Old<br>Oregon<br>Trail No.<br>006)       | SE of<br>Columbia<br>River<br>Highway<br>No. 2 (US-<br>730)<br>Interchange<br>(US-730)<br>[0.60 miles] | 168.55   | 19,389 | 19,286 | 19,664 | 20,230 | 20,641 | 1.6%                                          |
| I-84<br>(Old<br>Oregon<br>Trail No.<br>006)       | East of<br>Paterson<br>Ferry<br>Interchange<br>[0.40 miles]                                            | 171.53   | 19,796 | 19,686 | 20,159 | 20,700 | 21,259 | 1.8%                                          |
| I-84<br>(Old<br>Oregon<br>Trail No.<br>006)       | East of<br>Ordnance<br>Interchange<br>[0.30 miles]                                                     | 178.28   | 20,451 | 20,336 | 20,840 | 21,361 | 21,938 | 1.8%                                          |
| I-84<br>(Old<br>Oregon<br>Trail No.<br>006)       | East of<br>McNary<br>Interchange<br>(I-82) [0.60<br>miles]                                             | 180.05   | 16,459 | 16,336 | 17,800 | 17,916 | 18,400 | 2.9%                                          |
| I-84<br>(Old<br>Oregon<br>Trail No.<br>006)       | East of<br>Westland<br>Interchange<br>[0.30 miles]                                                     | 180.71   | 16,432 | 16,309 | 17,599 | 17,646 | 18,122 | 2.5%                                          |
|                                                   | Location                                                                                               | Milepost | 2024   |        |        |        |        | % Trucks                                      |
| Tower Road                                        |                                                                                                        |          |        |        |        |        |        |                                               |

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| Highway <sup>1</sup>                                                                                                                              | Location                                  | Milepost | 2021  | 2022 | 2023 | 2024 | 2025 | Average<br>Percent<br>Change<br>2021-<br>2025 |
|---------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|----------|-------|------|------|------|------|-----------------------------------------------|
| Tower<br>Road                                                                                                                                     | On Tower<br>Rd, North<br>of Kunze<br>Lane | N/A      | 1,308 |      |      |      |      | 28.3%                                         |
| Source: ODOT 2021, 2022, 2023, 2024, 2025a, 2026<br>1. The name/number in parenthesis is the ODOT name/number designation for each state highway. |                                           |          |       |      |      |      |      |                                               |

Table U-4 shows that from 2021 to 2025, AADT volumes increased by approximately 1.4 percent on average for I-84, while volumes for I-82 roadway segments decreased by approximately 0.6 percent, on average over the same period.

I-82, which carried an average volume of 19,716 vehicles per day in 2025 (compared to 18,717 average vehicles per day on I-84, as of 2025), saw a decrease of 288 vehicles per day, between 2021 and 2025. I-84 saw an increase of 1,050 vehicles per day between 2021 and 2025.

Due to the rural nature of the analysis area, recent traffic counts for county roads that are proposed as transportation routes are not available. The counties do not monitor traffic volumes on a yearly basis. The most recent version of the Morrow County Transportation System Plan (Morrow County 2022) indicates that the County only has one year of traffic-count data (2005) for a select group of roadway segments in the county. Traffic data in the Transportation System Plan indicate that Tower Road had an AADT of 2,600 in 2005, one of the highest counts of the roads included in the analysis (Morrow County 2022). However, in general, traffic volumes on Morrow County roadways are low. Existing volume-to-capacity ratios are low for county roads, and thus it is assumed that existing capacity deficiencies on any county roadways are unlikely (Morrow County 2022). County roadway volumes are minimal, with some increase during the summer and early fall for harvest of various crops in the area.

#### **4.3.8.3      *Pavement Conditions***

Pavement conditions can influence traffic safety issues. Poor pavement with potholes might cause vehicles to swerve, resulting in unsafe vehicle operation. ODOT's 2025 Pavement Condition data were reviewed for state highway transportation routes. Table U-5 shows the conditions for state highways anticipated to be used as part of the transportation routes to the Facility.

**Table U-5. Pavement Condition for State Highway Transportation Routes**

| Roadway                                             | Description                  | Starting Milepost | Ending Milepost | Pavement Condition |
|-----------------------------------------------------|------------------------------|-------------------|-----------------|--------------------|
| I-82                                                | COLUMBIA RVR - END OF JCP    | 0.4               | 0.5             | FR                 |
| I-82                                                | BEGIN CRCP - HWY 002 O-XING  | 0.5               | 1.02            | PR                 |
| I-82                                                | HWY 002 O-XING - JCT HWY 006 | 1.02              | 11.13           | GD                 |
| I-84                                                | GILLIAM CO. LINE - TOWER RD  | 149.5             | 159.3           | GD                 |
| I-84                                                | TOWER RD-BOARDMAN            | 159.3             | 163.5           | PR                 |
| I-84                                                | BOARDMAN - IRRIGON JCT       | 163.5             | 167.58          | FR                 |
| I-84                                                | IRRIGON JCT - JCT I-82       | 167.58            | 179.45          | FR                 |
| I-84                                                | JCT I-82 - MP 184.6          | 179.45            | 184.6           | PR                 |
| I-84                                                | 184.6 - STANFIELD INTCH      | 184.6             | 188.04          | GD                 |
| I-84                                                | STANFIELD INTCH - PENDLETON  | 188.04            | 203.65          | FR                 |
| Source: ODOT 2025b; GD = Good, FR = Fair, PR = Poor |                              |                   |                 |                    |

The majority of the sections of I-82 and I-84 being considered for the haul routes are in fair condition. There are some segments on I-82 and I-84 with a good rating as well. A fair rating indicates minor or low severity pavement deficiencies that typically lead to treatment such as chip seal or light resurfacing (ODOT 2025b); however, fair conditions do not indicate a safety hazard.

Tower Road's surface quality is not assessed by ODOT because it is a local roadway. It is a two-lane asphalt roadway with striping. In street level imagery dated 2026, the road surface appears to have intermittent cracking that has been recently sealed, suggesting a fair condition (Google Earth 2026).

#### **4.3.8.4 Air Transportation**

There is one aviation facility within the analysis area, considering both public and private airports: Boardman Airport (public; 7.3 miles north of the Amended Site Boundary). Otherwise, the next closest aviation facility is outside of the analysis area: Lexington Airport (16 miles south-southeast of the Amended Site Boundary). There is also one military facility within the analysis area, the Naval Weapons Systems Training Facility (NWSTF) Boardman, which is a U.S. Navy aviation training and testing site located more than 1 mile east of the Carty Solar Farm with proposed RFA 4 changes.

### **4.3.9 Police and Fire Protection**

Police service in the analysis area is primarily provided by county police departments; some of the cities in the analysis area have a city police department that operates within their respective cities but do not cover the Facility. As necessary, PGE relies on assistance from the nearest Morrow County Sheriff's Office, located in Heppner, Oregon. A record of correspondence with the Sheriff's Office has been provided in Attachment U-1. Additional law enforcement service is available through the Oregon State Police, with offices in Arlington, Heppner, Hermiston, and Pendleton, and through the Boardman Police Department. The small number of temporary construction workers and additional permanent-resident employees is not anticipated to place significant new demands on law enforcement agencies in the area.

Fire protection service in the analysis area is provided by the Boardman Fire Rescue District. The Certificate Holder will provide the fire department with construction plans, and locational information for Carty Solar Farm with proposed RFA 4 changes infrastructure, including access. A record of correspondence with the Fire Rescue District has been provided in Attachment U-1.

### **4.3.10 Health Care**

Because population density in the analysis area is relatively low, hospitals and health care services tend to be regional. The Irrigon Medical Clinic provides family medicine, urgent care, and minor surgery services, and is located approximately 20 miles from the Carty Solar Farm with proposed RFA 4 changes. There are three Level III Trauma centers within the vicinity of the Carty Solar Farm with proposed RFA 4 changes: Good Shepherd Medical Center (in Hermiston, Oregon), Trios Southridge Hospital (in Kennewick, Washington), and Kadlec Regional Medical Center (in Richland, Washington; DOH 2026, NEMSIS 2026). The closest Level I Trauma centers are the Legacy Emanuel Medical Center and Oregon Health and Science University Hospital, both located in Portland, Oregon. The Morrow County Health District's Emergency Medical Services (EMS) provides ground ambulance service as well as emergency air ambulance in collaboration with the Life Flight Network (Morrow County Health District 2026).

### **4.3.11 Schools**

The analysis area is within the Morrow County School District No 1. The nearest schools within the district are located in the town of Boardman, Oregon and include Sam Boardman Elementary School (9.3 miles northeast of the Facility), Windy River Elementary School (9.4 miles northeast of the Facility), and Riverside Junior/Senior High School (10.3 miles northeast of the Facility).

## **4.4 Potential Impacts on Public and Private Providers – OAR 345-001-0010(1)(u)(C)(D)**

*OAR 345-021-0010(1)(u)(C) A description of any likely adverse impact to the ability of the providers identified in (B) to provide the services listed in OAR 345-022-0110;*

*OAR 345-021-0010(1)(u)(D) Evidence that adverse impacts described in (C) are not likely to be significant, taking into account any measures the applicant proposes to avoid, reduce or otherwise mitigate the impacts; and*

The Carty Solar Farm with proposed RFA 4 changes is not expected to have any significant adverse impact on any public or private service providers in the analysis area during construction or operation. The Council previously found that the Carty Solar Farm was not likely to result in significant adverse impacts to public services within the analysis area,<sup>1</sup> and the amendments in RFA 4 do not alter that conclusion. No amendments to relevant conditions listed in the Third Amended Site Certificate to the Carty Generating Station are proposed.

#### **4.4.1 Sewer and Sewage Treatment**

No adverse impacts to sewer services are expected as a result of construction, as the only sewage services required for construction will be related to portable toilet sewage disposal via private contractor. During operations, PGE's staff will use the sanitary facilities at the proposed O&M building, which will not connect to public sewage infrastructure. PGE will follow Site Certificate Conditions 6.2, 6.22, and 10.24 in the Third Amended Site Certificate related to portable toilets and sewage management (Council 2022).

#### **4.4.2 Water**

PGE does not expect adverse impacts to water services, as non-potable water for construction will be sourced from the existing Carty Reservoir and potable water will mostly be sourced from the existing on-site Boeing well. No public sources of water will be used, and no new water rights will be required (see Exhibit O). PGE will follow Site Certificate Condition 10.23 regarding water sourcing, and Conditions 10.24, 10.28, 10.29, and 10.32 regarding wastewater discharges (Council 2022).

#### **4.4.3 Stormwater Drainage**

The Carty Solar Farm with proposed RFA 4 changes will not adversely impact public stormwater drainage facilities. Any construction-related stormwater will evaporate or infiltrate on site and no public stormwater facilities will be used. During construction, stormwater best management practices and monitoring will be implemented in accordance with the 1200-C National Pollution Discharge Elimination System (NPDES) Storm Water Discharge General Permit and draft Erosion and Sediment Control Plan (ESCP) (see Exhibit I, Attachment I-1) (Site Certificate Conditions 9.1, 9.2, and 9.4). The Carty Solar Farm with proposed RFA 4 changes will be graded in a manner to encourage stormwater to infiltrate the ground without the need for collection in stormwater swales or retention basins. During operation, PGE will monitor the area until soils are stabilized and evaluate whether construction-related impacts to soils are being adequately addressed by the

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<sup>1</sup> Final Order on Request for Amendment 1, p. 120 (December 2018).

mitigation procedures described in the draft Erosion and Sediment Control Plan and the Vegetation and Soil Management Plan (Site Certificate Condition 9.6). Stormwater management infrastructure installed during construction will, as needed, be left in place to continue functioning during operation. Such features may include roadside ditches, infiltration swales, or retention basins. These facilities will be located on private land and will not affect the provision of stormwater management services by any public agency. PGE will also follow wastewater discharge practices listed in Site Certificate Conditions 10.24, 10.28, 10.29, and 10.32 (Council 2022).

#### ***4.4.4 Solid Waste Management***

Construction and operation activities will not adversely impact solid waste management services. Solid waste will be disposed through contracts with local waste disposal providers (Site Certificate Condition 6.24). The Carty Solar Farm with proposed RFA 4 changes will implement a waste management plan during construction and operation, in accordance with Site Certificate Conditions 6.3. and 10.22. PGE will comply with Section 5, Public Responsibilities of the Morrow County's Solid Waste Management Ordinance (Condition 6.24; Council 2022). Exhibit W includes detailed information about types and quantities of solid waste and disposal.

PGE will contract with a private disposal service to transport any solid waste that is not recycled to an approved landfill. The Finley Buttes Landfill, located 9.8 miles east of the Facility, or Waste Management, Inc.'s Columbia Ridge Landfill, located 18.5 miles northwest of the Facility site, will be the most likely recipients for solid waste for the Carty Solar Farm with proposed RFA 4 changes. PGE expects construction waste to be within the handling capacities of the aforementioned landfills (see Attachment U-1 for a record of correspondence; Snider 2018; Anderson 2018; see Exhibit W).

#### ***4.4.5 Housing***

PGE does not expect adverse impacts to housing as a result of constructing or operating the Carty Solar Farm with proposed RFA 4 changes. Potential impacts on housing could result if there were an inadequate supply of housing in relation to the demand from the new temporary and permanent residents associated with the Carty Solar Farm with proposed RFA 4 changes; it is not yet known where the new temporary and permanent residents will settle and what type of housing they will select. However, based on the availability of housing options outlined in Section 4.3.7, adequate supply is available to accommodate the construction and operations employees.

The number of skilled local workforce is continuously growing as more solar energy projects are built in eastern Oregon. As discussed below, additional workers are likely to commute daily from communities outside the analysis area (within a 70-mile commutable distance), which will lessen impacts to housing associated with the in-migration of outside workers.

Based on the projected employment and population amounts for the Carty Solar Farm with proposed RFA 4 changes, temporary housing could be required for up to 132 new households during the peak construction period and about 22 new households on average during the 24-month construction period. However, this is based on the conservative assumption that 30 percent of

construction workers will be hired locally—and thus not require temporary housing—while the remainder will be from outside the 70-mile commuting distance. Additionally, it is assumed that most construction workers will be in the area for approximately 6 to 12 months as opposed to the full construction period. The actual number of temporary residents may be fewer if more locals are hired.

Hotels, motels, and trailer or RV parks will likely be the most viable available housing option for temporary residents. Publicly available hotel and motel occupancy data show an estimated statewide year-to-date occupancy rate of 75.1 percent in August from 2026 (Travel Oregon 2026). Hotel and motel occupancy rates also vary by region, with occupancy rates in Oregon generally higher in the Portland Metro area. For new workers that migrate to the area, approximately 95 hotels, motels, and recreation vehicle parks are within commuting distance to the Facility. Ample housing units will be available for longer-term workers (see Section 4.3.7; Hotels.com 2026, RV Life Campgrounds 2026). Additional rooms may be available in establishments that do not have information available online. Additional temporary housing will be available in overnight facilities located at private RV campgrounds or private, long-term rentals offered through companies like Airbnb. Consultation with cities will occur as necessary regarding temporary housing options prior to construction. Note that no RV usage is proposed at the Facility itself but rather at existing RV parks and campgrounds within a 70-mile commute distance.

Even if all migrant (non-local) construction workers sought temporary housing within the 70-mile analysis area, there will be enough supply to meet that demand. Industry experience indicates that construction workers are unlikely to relocate if commuting to work is an option, and that commuting an hour or more is common. Therefore, a 70-mile commute distance is certainly a conservative estimate based on keeping commute times to an hour or less. Additionally, based on PGE's experience during construction of the Carty Generating Station Unit 1 building from 2014 to 2016, much of the construction personnel are likely to be permanent residents within the area or temporary residents who commute from the Tri-Cities area in Washington within 70 miles (1 hour duration) commuting distance. That distance includes several communities that have greater housing availability (see Section 4.3.7), as well as other amenities when compared to options within 10 miles, which will attract workers in need of temporary housing. Although it cannot be assumed that housing facilities will have vacancies at any given time, adequate supplies are available within a commutable distance in relation to the number of temporary workers. Additionally, experience with energy facility construction, for example during the peak of wind power construction in 2009 and 2010 near the community of Arlington, Oregon, demonstrates that multiple facilities can be built in an area comparable to the analysis area without creating local housing issues. Therefore, no significant adverse housing impacts from construction of the Carty Solar Farm with proposed RFA 4 changes are anticipated.

Permanent housing for about 12 new households (with up to 3.0 people per household) may be required starting at the beginning of operations. For the maximum 36 new permanent residents expected because of Carty Solar Farm with proposed RFA 4 changes operations, it is anticipated that adequate opportunities will be available to purchase housing or to construct new housing in

the analysis area, or within a commutable distance from the Facility outside of the analysis area. Given the reasoning described in this section as well as the general availability of housing opportunities, no significant adverse impacts on the ability of communities to provide housing are anticipated from construction or operations of the Carty Solar Farm with proposed RFA 4 changes.

#### **4.4.6 Traffic**

PGE expects an average of 198 worker vehicle trips generated per day during construction of the Carty Solar Farm with proposed RFA 4 changes, with a peak of 301 worker vehicle trips (assuming a carpooling factor of 1.25). PGE expects a peak of 30 trucks per day or 60 truck trips per day by small and large trucks to deliver modules, trackers, and cabling. Thus, during peak construction, it is possible the Carty Solar Farm with proposed RFA 4 changes could generate approximately 361 trips per day. It is anticipated that 12 two-way vehicle trips per day will be required for maintenance personnel during operations. Transportation routes will be used to bring construction workers, equipment, and materials from outside of the analysis area to the Facility, and will include state and county roads. The primary transportation route is depicted in Figure U-1.

Construction and operation of the Carty Solar Farm with proposed RFA 4 changes will temporarily increase the traffic volume within the primary transportation route. However, construction-related traffic typically occurs during off-peak hours. Construction workers generally start their days earlier than the surrounding residents and construction trucks typically use roads in the middle of the day during off-peak hours. The private vehicle traffic will generally occur out of phase with the truck traffic, as the workers report earlier and leave later than most of the truck traffic. PGE will encourage carpooling for construction workers and include traffic safety as part of its safety training program.

As described in Section 4.3.8.2, in 2025 I-82 carried an average AADT volume of approximately 19,716 vehicles between the Washington/Oregon border and the Old Oregon Trail No. 006 (I-84) Interchange. Based on the above AADT estimates, for the construction period, construction vehicles could cause an average increase to 19,944 if 100 percent of the average construction traffic uses this route, which is a total increase of about 1.2 percent. This increase is expected to be inconsequential.

Between the I-84 intersections with OR-74 and I-82, I-84 carried an average AADT volume of approximately 18,717 vehicles in 2025. Based on the above AADT estimates, for the construction period, construction vehicles could cause an average increase to 18,945 if 100 percent of the average construction traffic uses this route, which is a total increase of about 1.2 percent. This increase is expected to be inconsequential.

At Tower Road just south of I-84, the 2024 AADT was found to be 1,308. With the addition of 100 percent of the average construction traffic, this will increase the anticipated vehicles per day to 1,536. This equates to a total increase in traffic of 17 percent. This increase is expected to be temporary and mitigated through the implementation of standards and measures outlined below.

PGE will coordinate with ODOT and Morrow County on any potential road closures, impacts, and permits needed for construction or movement of equipment and materials. PGE will implement all traffic-related Site Certificate Conditions (6.17–6.21, 6.23, 6.27, 7.3, 9.2, and 10.8), including those related to oversize/overweight delivery timing, parking, road wear and repair, and signage (Council 2022). A Construction Traffic Management Plan will be developed prior to construction, in accordance with Site Certificate Conditions 6.17 and 6.27, that will include traffic minimization measures at Tower Road that would be implemented as needed, staggering shift start times to reduce vehicle trips through the westbound I-84/Tower Road ramp terminal, installation of temporary traffic controls during peak construction, and other mitigation measures, as applicable (Council 2022). In accordance with Site Certificate Condition 6.19, PGE will ensure that any wear or damage to county roads as a result of the project is repaired, and that roads are restored to pre-construction condition or better (Council 2022).

Morrow County Zoning Ordinance 3.070.E requires a traffic impact analysis (TIA) be completed if the Carty Solar Farm with proposed RFA 4 changes will generate more than 400 passenger car equivalent (PCE) trips per day. While the project generates a peak of 361 trips per day, when considering PCEs, Morrow County requires a PCE rate of 2.2 passenger cars per truck for this calculation. With 30 trucks per day making 2 trips a day, this results in a peak PCE trip count of 433 PCE trips per day. Based on the assumptions described in Section 4.2, it is anticipated that the Facility will require a TIA. Prior to the start of construction, when staging and workforce assumptions are better known, the Certificate Holder will confirm expected passenger car equivalents and prepare a TIA (per Site Certificate Condition 6.27; Council 2022). The prepared TIA will also be used to inform consultation with the Morrow County Sheriff's Office. The Construction Traffic Management Plan will be submitted concurrently with the TIA (Condition 6.17 and 6.27).

#### *4.4.6.1 Traffic and Design Standards*

##### **Traffic Standards**

State highways are designed and constructed to handle legal loads of 80,000 pounds without a permit. During construction, it may be necessary for trucks exceeding the legal load limit to access the site via state highways. These trucks will potentially be used to deliver the substation transformers or heavy construction equipment. Note that per Site Certificate Condition 6.21, oversize and overweight deliveries shall be made by rail or barge as feasible to avoid impacts to the I-84 and Tower Road interchange (Council 2022). Before construction, the transportation contractor will consult with the Morrow County Road Department and ODOT to determine whether any segments of roadway or bridges are restricted for travel, and to obtain any oversize/overweight permits required to allow transport of these loads. There are no permanent restrictions on state highways proposed for transportation routes. Because the state highways are built to accommodate overweight vehicles with permits, impacts to safety or roadway pavement conditions are not expected. Vehicles up to 75 feet in length are allowed without special permitting on the construction transportation routes. There are requirements imposed by Morrow County and ODOT, such as the previously referenced Construction Traffic Management Plan (Site Certificate

Conditions 6.17 and 6.27; Council 2022), to promote traffic safety and prevent cumulative damage to the pavement along the primary transportation routes identified in this exhibit.

### **Design Standards**

County and local roadways are expected to safely accommodate Carty Solar Farm with proposed RFA 4 changes construction traffic. Note that no county or local roadways are anticipated to require improvement prior to construction. Note that road conditions could change, thus the Construction Traffic Management Plan will reflect what is actually needed at the time of preconstruction compliance for the Carty Solar Farm with proposed RFA 4 changes (Site Certificate Conditions 6.17 and 6.27; Council 2022). To ensure the integrity of local roads, the Certificate Holder will coordinate with local transportation officials to make improvements where necessary to accommodate Facility construction traffic, and improvements will be restricted to areas within the respective rights-of-way. Per Site Certificate Condition 9.2, construction truck traffic must be limited to improved road surfaces to avoid soil compaction (Council 2022).

The Certificate Holder will work with ODOT and the Morrow County Road Department to ensure that any unusual damage or wear to state or county roads that is caused by Facility construction is repaired by the Certificate Holder consistent with Condition 6.19. All county roads on the primary transportation route will be evaluated prior to and after construction of the Carty Solar Farm with proposed RFA 4 changes to determine what, if any, degradation has occurred. Inspections will include monitoring of roadway conditions after the completion of construction activities. Monitoring may include the use of video footage, photographs, and engineer field notes to document road conditions. During construction of the Carty Solar Farm with proposed RFA 4 changes, the contractor will obtain authorization from ODOT and Morrow County before proceeding with overweight loads on state- or county-maintained roadways. The Certificate Holder will strictly abide to travel conditions and transportation equipment requirements enforced by either ODOT or Morrow County. Upon completion of construction, the Certificate Holder will restore county roads to their pre-construction condition or better, to the satisfaction of the County Road Department. Regardless of existing pavement conditions, roadway segments will be reviewed prior to any added construction traffic, and a system for monitoring safety or degradation to pavement will be developed for the necessary roadways prior to construction (Site Certificate Condition 6.19; Council 2022). The Certificate Holder will ensure that the construction and operation of the Carty Solar Farm with proposed RFA 4 changes will maintain ODOT's and Morrow County's road systems in as good or better quality than prior to the Facility's construction.

#### ***4.4.6.2 Air Transportation***

There is one aviation facility within the analysis area, Boardman Airport, located over seven miles from the Amended Site Boundary; this airport does not meet the notice criteria based on Federal Aviation Administration (FAA)-identified impact areas (i.e., over 3.8 miles from the Amended Site Boundary), and therefore formal submission of a Form 7460-1 to the FAA under Code of Federal Regulations (CFR) Title 14 Part 77.9 (Safe, Efficient Use, and Preservation of the Navigable Airspace) is not anticipated. Additionally, the one military facility within the analysis area, the

NWSTF Boardman, is a U.S. Navy aviation training and testing site located more than one mile east of the Carty Solar Farm with proposed RFA 4 changes and will therefore not create any physical obstruction to use of the training facility. As part of RFA 1, the U.S. Navy and PGE discussed the potential for glare from the Carty Solar Farm to impact flight paths to the NWSTF Boardman. Following that discussion, PGE filed a Notice of Proposed Construction (Form 7460-1) with the FAA on July 13, 2016, and the FAA subsequently issued a determination of no hazard. In support of the Carty Solar Farm with proposed RFA 4 changes, the U.S. Navy and PGE discussed the potential for increased glare from the additional solar modules. The U.S. Navy concluded that no additional glare and glint analysis is required for the Carty Solar Farm with proposed RFA 4 changes (Kimberly Peachner, U.S. Navy NW Training Range Complex, pers. comm., e-mail message, October 23, 2023). To confirm that a formal FAA notification was not required for the Carty Solar Farm with proposed RFA 4 changes, PGE utilized the FAA Notice Criteria Tool. PGE initiated the Department of Defense's Military Aviation and Installation Assurance Siting Clearinghouse Informal Review Process to confirm there is no impact to the nearby Boardman Bombing Range; the response indicated that the solar project will have minimal impact on military operations (see Attachment U-2 for the correspondence).

#### ***4.4.7 Police and Fire Protection***

The relatively small number of new temporary and permanent residents is not expected to create significant new demands on the police or fire protection services for the area. Any impacts to police and fire services will be intermittent and temporary during construction, as construction workers will remain on-site for 24 months.

During construction and operation of the Carty Solar Farm with proposed RFA 4 changes, the Certificate Holder will provide for on-site security and maintain good communications between on-site security personnel and the Morrow County Sheriff's Office, consistent with Condition 8.1. During operation, the Certificate Holder will ensure that appropriate law enforcement agency personnel have an up-to-date list of the names and telephone numbers of Carty Solar Farm with proposed RFA 4 changes personnel available to respond on a 24-hour basis in case of an emergency on the site (Condition 8.1).

PGE has previously consulted with the Morrow County Sheriff's Office and the Boardman Rural Fire Protection District (previous name; now the Boardman Fire Rescue District) to address potential impacts and committed to coordinating with them regarding appropriate traffic safety measures. PGE has provided records of correspondence specific to the Carty Solar Farm with proposed RFA 4 changes in Attachment U-1. PGE will provide the Boardman Fire Rescue District with construction plans, schedules, and locations prior to the start of construction.

Solar panels contain a number of safety features designed to provide increased fire protection. The BESS also introduces an element that could pose a fire hazard. Lithium-ion batteries must be kept in a temperature-controlled facility with individual battery modules isolated to prevent the spread of fire if it were to occur. The lithium-ion BESS will incorporate a fire response system as designed by

the battery manufacturer. During the operational phase of the Carty Solar Farm with proposed RFA 4 changes, fire danger will be minimal.

The following measures could be implemented to minimize fire and safety risks:

- Conditions in Section 8.0 of the Site Certificate (On-Site Safety and Security) will be followed during construction and operation of the Facility, including conditions related to implementing fire safety plans and health and safety plans, mitigating fire risk, and coordinating with the Boardman Fire Rescue District (Condition 8.7) (Council 2022).
- All electrical equipment will meet National Electrical Code and Institute of Electrical and Electronics Engineers standards.
- Adequate firefighting equipment and water supplies will be maintained and made available during operations that carry a high fire risk (e.g., metal cutting, welding, parking in high, dry grass).
- The solar array will have shielded electrical cabling to prevent electrical fires.
- The collector system and substation will have redundant surge arrestors to deactivate the Facility during unusual operational events that could start fires.
- Facility infrastructure will be spaced sufficiently (fire breaks) to prevent the spread of fire.
- A non-flammable gravel base will be installed around the solar inverters, substation, and BESS.
- Smoke/fire detectors will be placed around the site that will be tied to the Supervisory Control and Data Acquisition system and will contact local firefighting services.
- Vehicles and equipment will drive and park on maintained graveled areas and roads to the extent practicable; roads will be established before accessing the site to keep vehicles away from grass (Condition 8.4 and 8.5).
- Vehicles will avoid idling in grassy areas, and cutting torches and similar equipment will be kept away from grass (Condition 8.4 and 8.5).
- Diesel vehicles will be used whenever practicable to prevent potential ignition by catalytic converters.
- Roads will be sufficiently sized for emergency vehicle access.
- Fire prevention and response training will be administered annually to all on-site employees (Condition 8.5). Operations staff will be trained in the use of fire extinguishers for responding to incipient stage fires on site (Condition 8.6).
- An Carty Solar Farm with proposed RFA 4 changes site plan will be submitted to fire protection officials including current contact information for personnel (Condition 8.8).
- Off-site, 24-hour monitoring of the BESS will be implemented and will include shutdown capabilities.

- The BESS will be stored in completely contained, leak-proof modules, and will be inspected regularly according to the manufacturer's recommendations.
- Transportation of lithium-ion batteries is subject to 49 CFR 173.185 – Department of Transportation Pipeline and Hazardous Material Administration. This regulation contains requirements for prevention of a dangerous evolution of heat; prevention of short circuits; prevention of damage to the terminals; and prevention of batteries coming into contact with other batteries or conductive materials. Adherence to the requirements and regulations, personnel training, safe interim storage, and segregation from other potential waste streams will minimize any public hazard related to transport, use, or disposal of batteries.
- Design of BESS will be in accordance with applicable Underwriters Laboratories (specifically, 1642, 1741, 1973, 9540A), National Electric Code, and National Fire Protection Association (specifically 855) standards, which require rigorous industry testing and certification related to fire safety and/or other regulatory requirements applicable to battery storage at the time of construction.
- The site will be mowed as needed for fire safety requirements and to keep vegetation from interfering with operation and maintenance activities.
- A physical vegetation survey assessment of the fenced area will be completed at least twice a year (and seasonally as needed during heightened fire risk) to monitor for vegetation clearances, maintain fire breaks, as applicable, and monitor for wildfire hazards.
- The programs outlined in Exhibit V will be implemented to minimize fire risk during operations.

The Certificate Holder proposes revisions to Site Certificate Condition 8.8 to incorporate the amendments proposed in RFA 4 as follows:

8.8 Upon the beginning of operation of Unit 1, ~~facility components approved in Final Order on RFA1, or~~ facility components approved in Final Order on RFA2, ~~or facility components approved in Final Order on RFA4~~, the certificate holder shall provide a site plan to the Boardman ~~Rural~~ Fire ~~Protection-Rescue~~ District. The certificate holder shall indicate the actual location of all facility structures on the site plan. The certificate holder shall provide an updated site plan if additional structures are later added to the facility. During operation, the certificate holder shall ensure that appropriate fire protection agency personnel have an up-to-date list of the names and telephone numbers of facility personnel available to respond on a 24-hour basis in case of an emergency on the facility site.

[Final Order IV.M.2.8] [AMD4]

Both Condition 8.8 and Condition 8.7 also update the Boardman Rural Fire Protection District to the Boardman Fire Rescue District to reflect a name change; this is intended as clarification and is not intended to materially change the original intent of the condition (refer to Section 6.0 of the RFA 4's Division 27 document [Request for Amendment 4 for the Carty Generating Station]).

#### **4.4.8 Health Care**

PGE does not expect construction or operation of the Carty Solar Farm with proposed RFA 4 changes to have adverse impacts on local and regional emergency health service providers, hospitals, or health clinics, considering the relatively small number of personnel that will be added for construction and operation of the Carty Solar Farm with proposed RFA 4 changes. Healthcare providers appear to have adequate capacity for potential patients associated with the Carty Solar Farm with proposed RFA 4 changes, and the need for healthcare services will be minimized through implementation of robust health and safety programs (Site Certificate Conditions 8.2 and 8.3; Council 2022). The Carty Solar Farm with proposed RFA 4 changes will also comply with all emergency planning and notification requirements of Emergency Planning and Community Right-to-Know Act (Site Certificate Condition 7.4) and will notify the Oregon Department of Energy and Morrow County within 72 hours of any event that threatens public health and safety or the environment (Site Certificate Condition 7.8; Council 2022).

In an emergency, Morrow County EMS will likely provide emergency medical transportation to the Good Shepherd Medical Center in Hermiston, Oregon (Morrow County Health District 2026). If more advanced treatment is needed, patients may be flown via helicopter or fixed-wing aircraft to Level I Trauma centers in Portland, Oregon. Construction workers are expected to adhere to contractor safety programs, which will prevent serious injuries and the need for ambulance or hospital services.

#### **4.4.9 Schools**

PGE does not expect construction or operation of the Carty Solar Farm with proposed RFA 4 changes to have adverse impacts on schools, considering the relatively small number of new students that will be enrolled. No schools are located within the Amended Site Boundary or will be directly affected by Facility construction or operations. During operations, up to 12 new permanent households (assuming a household size of 3.0) may require school services, which should not adversely impact school operations. Impacts on school services will depend on the housing choices of new residents with children, which cannot be predicted; however, given the number of schools in the locations in which new residents are likely to settle, and the small number of new school children expected, it is unlikely that any one school will receive more new students than it can accommodate. To the extent possible, PGE will coordinate the timing of oversized/overweight vehicles and equipment deliveries to avoid peak school traffic times and bus routes. Note that truck traffic (inclusive of large component or equipment deliveries) will generally not coincide with morning and evening peak hours; rather, truck traffic will be dispersed throughout the working day. School buses are anticipated to be operational in the mornings and evenings, before and after schools are in session, and thus are not anticipated to coincide with the timing of construction truck traffic.

## 5.0 Proposed Monitoring Programs

OAR 345-021-0010(1)(u)(E) *The applicant's proposed monitoring program, if any, for impacts to the ability of the providers identified in (B) to provide the services listed in OAR 345-022-0110.*

Because PGE does not anticipate the construction and operation of the Carty Solar Farm with proposed RFA 4 changes to have long-term significant adverse impacts on the ability of service providers in the analysis area to provide services, PGE does not plan any monitoring programs other than the monitoring efforts required under NPDES and the Traffic Management Plan. PGE will continue to communicate with the Morrow County Planning Department and local service providers to keep them informed of major developments at the Carty Solar Farm with proposed RFA 4 changes that could potentially affect public services.

## 6.0 Conclusion

The evidence provided in this exhibit demonstrate that the Carty Solar Farm with proposed RFA 4 changes will not result in a significant adverse impact on the ability of public and private entities in the analysis area to provide the following services: sewers and sewage treatment, water, stormwater drainage, solid waste management, housing, transportation and traffic safety, police protection, fire protection and emergency response, health care, and schools.

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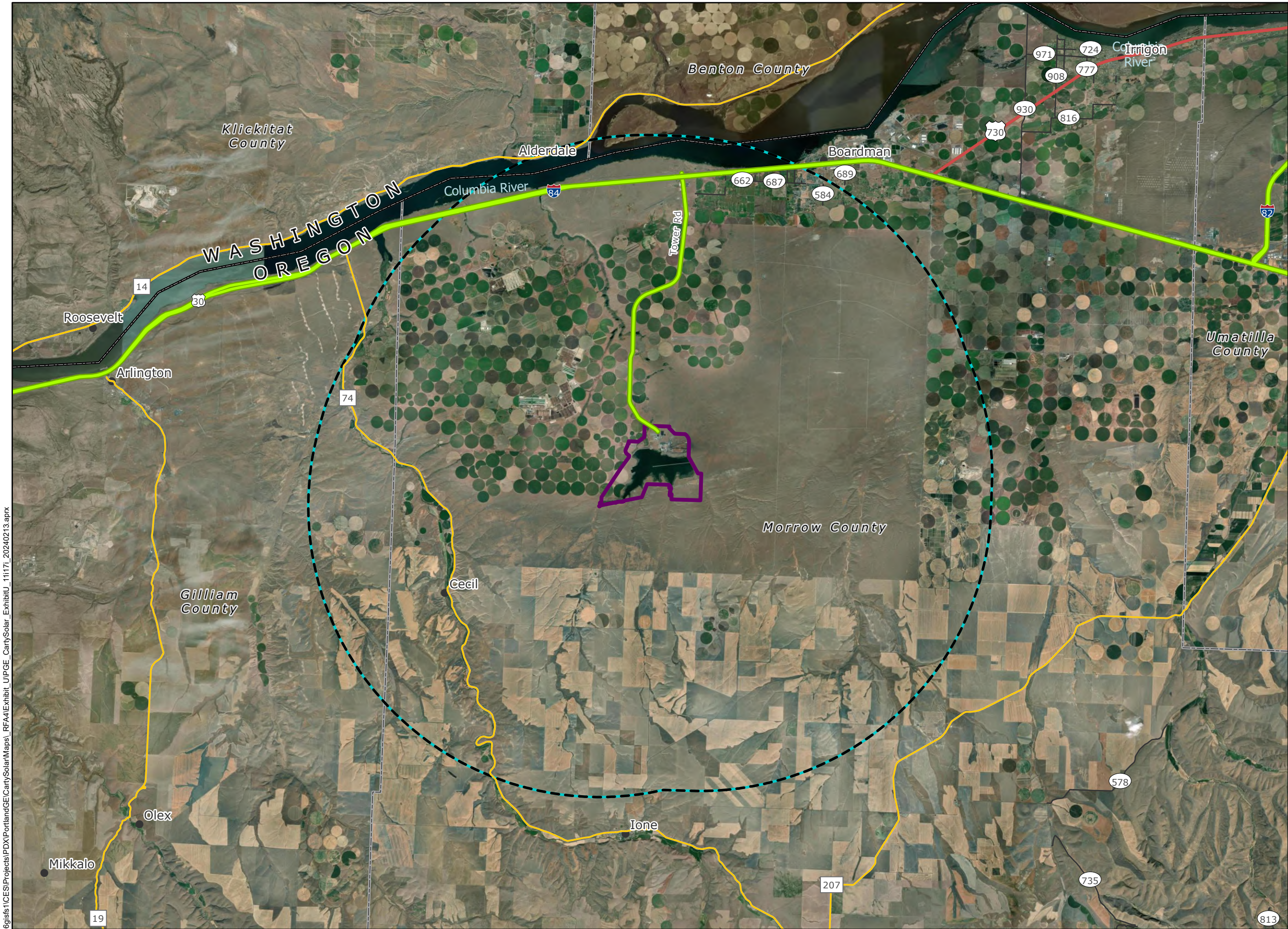
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# Figures

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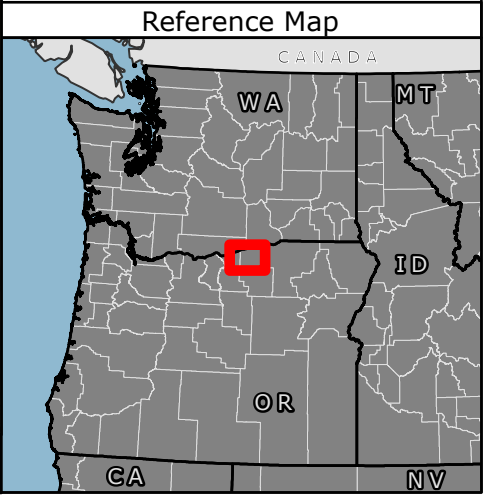


**Carty  
Generating Station  
Request for  
Amendment 4**

**Figure U-1  
Analysis Area and  
Primary Construction  
Transportation Route**

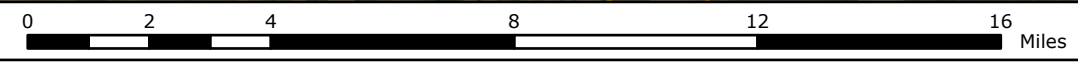
**MORROW COUNTY, OR**

- Amended Site Boundary
- Analysis Area (10-mile Buffer)
- City/Town
- County Boundary
- State Boundary
- Interstate Highway
- US Highway
- State Highway
- County Highway
- Primary Construction Traffic Route



1:200,000

WGS 1984 UTM Zone 11N



NOT FOR CONSTRUCTION

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## **Attachment U-1. Service Provider Letters**

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**From:** Michael Hughes <MHughes@boardmanfd.com>  
**Sent:** Monday, October 26, 2026 8:32 AM  
**To:** Seilo, Paul <PAUL.SEILO@tetrattech.com>  
**Cc:** St Amand, Beth <BETH.STAMAND@tetrattech.com>  
**Subject:** RE: PGE Carty Generating Station, Proposed Solar and Battery Storage - service request

⚠ **CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. ⚠

Mr. Seilo,

As you know, we currently provide and will continue to provide fire and EMS service to that location. Additionally, we are hopeful, that construction of our second staffed station will begin in 2027. It will be located on Airport Lane. Having a station at this location will dramatically reduce response times to the PGE facility.

Please let me know if you have any questions.

Thank you,

Mike Hughes  
Fire Chief



---

**From:** Seilo, Paul <PAUL.SEILO@tetrattech.com>  
**Sent:** Sunday, October 25, 2026 3:56 PM  
**To:** Michael Hughes <MHughes@boardmanfd.com>  
**Cc:** St Amand, Beth <BETH.STAMAND@tetrattech.com>  
**Subject:** PGE Carty Generating Station, Proposed Solar and Battery Storage - service request

Mr. Hughes,

I am contacting you on behalf of Portland General Electric (PGE), regarding the Carty Generating Station (Carty). Carty is an approved 450-megawatt (MW) natural gas facility operating in Morrow County and owned by PGE. PGE is proposing to add 200 MW of solar generating capacity and a 200-MW battery energy storage system at Carty. In order to add the solar and battery energy storage system at Carty, PGE has submitted a preliminary Request for Amendment 4 (pRFA4) of the Site Certificate to the Oregon Department of Energy (ODOE). See the attached Figure 2 from the pRFA4 for preliminary site layout and location. More information on Carty can be found here: <https://www.oregon.gov/energy/facilities/Pages/cgs.aspx>

Tetra Tech is under contract to PGE to assist with the Request for Amendment process. To this end, we will provide ODOE with evidence of consultation with local service providers that we have been in contact regarding fire protection services for the construction of the solar and battery components at Carty. At this point in the process, PGE is not required to have entered into any agreements or contract with the Boardman Fire Rescue District, we just need to demonstrate to ODOE that we have been in consultation with the Boardman Fire Rescue District and that yes, you are able to provide fire protection services, as well as any constraints you may have (e.g., high angle, confined space rescue). Any letter from you to me on this subject does not constitute a contract and you are under no obligation to provide fire protection services for the facility.

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

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

**Paul Seilo, AICP**

Senior Project Manager

Mobile +1 (503) 200-0005 | [paul.seilo@tetrattech.com](mailto:paul.seilo@tetrattech.com)

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**From:** [Jeff Bishop](#)  
**To:** [Seilo, Paul](#)  
**Subject:** Finley Buttes landfill  
**Date:** Monday, October 26, 2026 10:05:45 AM

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Jeff Bishop  
360-831-2514  
Sent from my iPhone



## MORROW COUNTY SHERIFF

325 Willow View Drive • P.O. Box 159  
Heppner, Oregon 97836  
Phone: (541) 676-5317  
Fax: (541) 676-5577

**John A. Bowles, Sheriff**  
**Brian L. Snyder, Undersheriff**

Date: October 26, 2026  
To: Paul Seilo, AICP  
Senior Project Manager  
Tetra Tech

Subject: Consultation Response – Law Enforcement Services for Carty Generating Station  
Preliminary Request for Amendment 4 (pRFA4)

Dear Mr. Seilo,

I am writing in response to your inquiry regarding the availability of law enforcement services for the proposed expansion at the Carty Generating Station in Morrow County. I understand that Portland General Electric is submitting a preliminary Request for Amendment 4 to the Oregon Department of Energy to add 200 MW of solar generating capacity and a 200-MW battery energy storage system at the existing facility.

Please accept this letter as verification that the Morrow County Sheriff's Office has been consulted regarding the proposed project. This agency currently provides primary law enforcement services to the geographic area encompassing the Carty Generating Station site. We have the capability and capacity to respond to calls for service and provide public safety protection during both the construction phase and the subsequent operations of the new solar and battery components.

As with any project of this scale, our regular operations are subject to standard rural law enforcement constraints, including response times based on deputy proximity at the time of a call and overall office resource allocation. We anticipate no unique constraints that would prevent us from servicing this site under our standard operational procedures.

We look forward to maintaining open communication and working collaboratively with Portland General Electric and Tetra Tech as this project moves forward to ensure safety and security for the facility, its workforce, and the residents of Morrow County. As noted in your inquiry, this letter serves as evidence of consultation for the ODOE siting process and does not constitute a binding contract or service agreement.

If you or the Oregon Department of Energy require further information regarding our operational capabilities, please feel free to contact my office.

Sincerely,

A handwritten signature in blue ink that reads "John A. Bowles".

John A. Bowles  
Sheriff, Morrow County

## **Attachment U-2. Letter from Military Aviation and Installation Assurance Siting Clearinghouse**

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ENERGY, INSTALLATIONS  
AND ENVIRONMENT

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

3400 DEFENSE PENTAGON  
WASHINGTON, DC 20301-3400

February 21, 2024

Lenna Cope  
Portland General Electric Company  
121 SW Salmon St.  
Portland, OR 97204

Dear Ms. Cope,

As requested, the Military Aviation and Installation Assurance Siting Clearinghouse coordinated within the Department of Defense (DoD) an informal review of the Carty Generating Station Project. The results of our review indicated that the solar project, located in Morrow County, Oregon, as proposed, will have minimal impact on military operations conducted in the area.

Please note that this informal review by the DoD Military Aviation and Installation Assurance Siting Clearinghouse does not constitute an action under 49 United States Code Section 44718 and that the DoD is not bound by the conclusion arrived at under this informal review. To expedite our review in the Obstruction Evaluation Airport Airspace Analysis (OE/AAA) process, please add the project number 2024-01-S-DEV-32 in the comments section of the filing. If you have any questions, please contact me at [robbin.e.beard.civ@mail.mil](mailto:robbin.e.beard.civ@mail.mil).

Sincerely,

A handwritten signature in blue ink, reading "Robbin Beard", is positioned above the typed name.

Robbin Beard  
Deputy Director  
Military Aviation and Installation  
Assurance Siting Clearinghouse