

Notice of Intent to Apply for a Site Certificate

**Speedway Solar Facility
July 2024**

**Submitted to
Oregon Energy Facility Siting Council**

**Prepared for
Brookfield Speedway Solar Holdings LLC**

Prepared by



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Table of Contents

Exhibit A. Applicant Information – OAR 345-020-0011(1)(a) 1

Exhibit B. Facility Description – OAR 345-020-0011(1)(b)..... 6

Exhibit C. Facility Location – OAR 345-020-0011(1)(c)..... 14

Exhibit D. Alternative Locations – OAR 345-020-0011(1)(d)..... 15

Exhibit E. Permits Needed for Construction and Operation – OAR 345-020-0011(1)(e)..... 16

Exhibit F. Property Ownership – OAR 345-020-0011(1)(f) 22

Exhibit G. Facility Maps – OAR 345-020-0011(1)(g)..... 23

Exhibit H. Non-generating Energy Facility – OAR 345-020-0011(1)(h) 26

Exhibit I. Land Use – OAR 345-020-0011(1)(i) 27

Exhibit J. Environmental Impacts – OAR 345-020-0011(1)(j) 28

 Air Quality..... 28

 Surface and Groundwater 29

 Wetlands and Waters of the State of Oregon 30

 Wildlife and Wildlife Habitat 30

 Sensitive, Threatened, and Endangered Species 31

 Historic, Cultural, and Archaeological Resources 31

 Scenic Resources..... 32

 Recreational Opportunities 32

 Land Use 32

 Wildfire Risk..... 32

Exhibit K. Community Service Impacts – OAR 345-020-0011(1)(k) 34

 Sewers and Sewage Treatment..... 34

 Water 34

 Stormwater Drainage..... 35

 Solid Waste Management..... 35

 Housing..... 36

 Construction..... 36

 Operation..... 36

 Traffic Safety..... 36

 Police and Fire Protection..... 37

Health Care 38

Schools 38

Exhibit L. Protected Areas – OAR 345-020-0011(1)(l) 39

Exhibit M. Water Sources and Use – OAR 345-020-0011(1)(m)..... 45

 Construction 45

 Operation 45

Exhibit N. Carbon Dioxide Emissions – OAR 345-020-0011(1)(n) 47

Exhibit O. Evaluation of Statutes, Rules, and Ordinances – OAR 345-020-0011(1)(o)..... 48

Exhibit P. Schedule for Application for Site Certificate – OAR 345-020-0011(1)(p)..... 51

Exhibit Q. Evidence of Consultation with State Commission on Indian Services – OAR 345-020-0011(1)(q)..... 52

References..... 53

List of Tables

Table C-1. Township, Range, and Sections within the Facility Site Boundary 14

Table E-1. Permits or Other Approvals Required for Construction and Operation of the Facility 16

Table J-1. Study Areas for Environmental Impacts 28

Table J-2. Land Cover within the Facility Site Boundary..... 30

Table L-1. Protected Areas Inventory 41

Table O-1. Statutes, Rules, and Ordinances Containing Relevant Standards or Criteria 48

Table P-1. Proposed Schedule for Application for Site Certificate Submittal..... 51

Figures

Figure 1. Site Vicinity

Figure 2. Facility Site Overview

Figure 3. Zoning

Figure 4. Study Area Boundaries

Figure 5. Topography

Figure 6. Protected Areas

Figure 7. National Wetlands Inventory and National Hydrography Dataset

Figure 8. Energy Facilities

List of Attachments

Attachment 1. Articles of Organization

Attachment 2. Tax Lots and Property Owner Information

Attachment 3. Correspondence with Legislative Commission on Indian Services

Acronyms and Abbreviations

AC	alternating current
ACDP	Air Contaminant Discharge Permit
Applicant	Brookfield Speedway Solar Holdings LLC
ASC	Application for Site Certificate
BESS	battery energy storage system
BPA	Bonneville Power Administration
CFR	Code of Federal Regulations
DC	direct current
EFSC	Oregon Energy Facility Siting Council
FAA	Federal Aviation Administration
Facility	Speedway Solar Facility
gen-tie	generational tie
kV	kilovolt
LLC	limited liability company
MW	megawatt
NHD	National Hydrography Dataset
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ODEQ	Oregon Department of Environmental Quality
ODOT	Oregon Department of Transportation
ODFW	Oregon Department of Fish and Wildlife
ORBIC	Oregon Biodiversity Information Center
ORS	Oregon Revised Statutes
POI	point of interconnection
PV	photovoltaic
RFPD	Rural Fire Protection District
ROW	right of way
SCZO	Sherman County Zoning Ordinance

USC	United States Code
USFWS	U.S. Fish and Wildlife Service
WPCF	Water Pollution Control Facilities

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Exhibit A. Applicant Information – OAR 345-020-0011(1)(a)

(a) Exhibit A. Information about the applicant and participating persons, including:

(A) The name and address of the applicant including all co-owners of the proposed facility, the name, mailing address, email address and telephone number of the contact person for the NOI, and if there is a contact person other than the applicant, the name, title, mailing address, email address and telephone number of that person;

Response:

Name and mailing address of Applicant:

Brookfield Speedway Solar Holdings LLC
c/o Brookfield Renewable U.S.
200 Liberty St., 14th Floor
New York, NY 10281

Applicant contact person for the NOI with mailing address and telephone number:

Benjamin D. Adams; Manager, Asset Development
Brookfield Renewable U.S.
200 Liberty St., 14th Floor
New York, NY 10281
(646) 992-2508
benjamin.adams@brookfieldrenewable.com

(B) The contact name, mailing address, email address and telephone number of all participating persons, other than individuals, including but not limited to any parent corporation of the applicant, persons upon whom the applicant will rely for third-party permits or approvals related to the facility, and persons upon whom the applicant will rely in meeting any facility standard adopted by the Council;

Response:

Parent Company:

Brookfield Renewable U.S.
200 Liberty St., 14th Floor
New York, NY 10281

Contact Name, Mailing Address, Email Address, and Telephone Number:

Benjamin D. Adams; Manager, Asset Development
Brookfield Renewable U.S.
200 Liberty St., 14th Floor
New York, NY 10281
(646) 992-2508
benjamin.adams@brookfieldrenewable.com

Contact persons other than the Applicant:

Carrie Andrews
Tetra Tech, Inc.
1750 SW Harbor Way, Suite 400
Portland, OR 97213
(503) 721-7228
carrie.andrews@tetrattech.com

Timothy McMahan
Stoel Rives LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
(503) 504-8693
tim.mcmahan@stoel.com

(C) If the applicant is a corporation:

(i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the NOI;

(ii) The date and place of its incorporation;

(iii) A copy of its articles of incorporation and its authorization for submitting the NOI; and

(iv) In the case of a corporation not incorporated in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon.

Response: The Applicant is not a corporation.

(D) If the applicant is a wholly owned subsidiary of a company, corporation or other business entity, in addition to the information required by paragraph (C), the full name and business address of each of the applicant's full or partial owners.

Response: The Applicant, Brookfield Speedway Solar Holdings LLC, is a subsidiary of their parent company:

Brookfield Renewable U.S.
200 Liberty St., 14th Floor
New York, NY 10281

(E) If the person submitting the NOI is an association of citizens, a joint venture or a partnership:

(i) The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the NOI;

(ii) The name, business address and telephone number of each person participating in the association, joint venture or partnership and the percentage interest held by each;

(iii) Proof of registration to do business in Oregon;

(iv) A copy of its articles of association, joint venture agreement or partnership agreement and a list of its members and their cities of residence; and

(v) If there are no articles of association, joint venture agreement or partnership agreement, the applicant must state that fact over the signature of each member.

Response:

The Applicant is not an association of citizens, a joint venture, or partnership.

(F) If the applicant is a public or governmental entity:

(i) The full name, official designation, mailing address, email address and telephone number of the person responsible for submitting the NOI; and

(ii) Written authorization from the entity's governing body to submit an NOI.

Response:

The Applicant is not a public or governmental entity.

(G) If the applicant is an individual, the individual's mailing address, email address and telephone number.

Response:

The Applicant is not an individual.

(H) If the applicant is a limited liability company:

(i) The full name, official designation, mailing address, email address and telephone number of the officer responsible for submitting the NOI;

(ii) The date and place of its formation;

(iii) A copy of its articles of organization and its authorization for submitting the NOI; and

(iv) In the case of a limited liability company not registered in Oregon, the name and address of the resident attorney-in-fact in this state and proof of registration to do business in Oregon.

Response:

The Applicant is a limited liability company (LLC). The Applicant contact submitting this Notice of Intent (NOI) is:

Benjamin D. Adams; Manager, Asset Development

Brookfield Renewable U.S.

200 Liberty St., 14th Floor

New York, NY 10281

(646) 992-2508

benjamin.adams@brookfieldrenewable.com

The officer for Brookfield Speedway Solar Holdings LLC is:

John M. Soininen; Vice President, Development

200 Liberty St., 14th Floor

New York, NY 10281

(646) 992-2427

john.soininen@brookfieldrenewable.com

Brookfield Speedway Solar Holdings LLC was formed with the Secretary of State of the State of Delaware on June 10, 2024, and was acknowledged and registered to do business in Oregon by the Oregon Secretary of State on June 24, 2024, in Salem, Oregon. The articles of organization and registration to do business in Oregon are provided in Attachment 1.

Brookfield Speedway Solar Holdings LLC is registered in Oregon; therefore, information for the resident attorney-in-fact is not required.

Exhibit B. Facility Description – OAR 345-020-0011(1)(b)

(b) Exhibit B. Information about the proposed facility, including:

(A) A description of the proposed energy facility, including as applicable:

Response:

The Applicant proposes construction and operation of the Speedway Solar Facility (Facility) in unincorporated Sherman County, Oregon (Figure 1). The Facility includes photovoltaic (PV) solar energy generation and a battery energy storage system (BESS). The Facility will consist of up to 900 megawatts (MW) of solar generation and 500 MW of alternating current (AC) energy storage with an 8-hour duration. The Facility's site boundary encompasses 8,782 acres of privately owned land that is approximately 0.75 miles east of the city of Grass Valley and 5 miles southeast of the city of Moro. The Facility's proposed point of interconnection (POI) to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt (kV) Ashe-Marion Transmission Line, which generally runs northeast/southwest through the site boundary (Figure 2).

The Applicant is currently conducting studies that will be included in the Application for Site Certificate (ASC) to Oregon's Energy Facility Siting Council (EFSC). The Applicant intends to begin on-site construction in the first quarter of 2026, pending issuance of a Site Certificate from EFSC, with a commercial operation target date in the first quarter of 2029.

(i) For electric power generating plants, the nominal electric generating capacity and the average electrical generating capacity, as defined in ORS 469.300;

Response:

The Facility will have up to 900 MW of nominal and average generating capacity, as defined in Oregon Revised Statutes (ORS) 469.300(4)(c).

(ii) Major components, structures and systems, including a description of the size, type and configuration of equipment used to generate, store, transmit, or transport electricity, useful thermal energy, or fuels;

Response:

The Facility's major components are the solar arrays, which consist of solar modules, tracker systems, posts, and related electrical collector equipment. The ASC will analyze potential impacts associated with the largest solar array layout within the approximately 8,782-acre Facility site boundary. The actual solar array equipment and layout selected at final design will not exceed the potential impacts analyzed in the Facility site boundary. During pre-construction and final design

engineering, the Applicant will specify the Facility components, equipment, and layout in accordance with the reporting requirements of the Oregon Department of Energy (ODOE). The Applicant seeks flexibility to permit a range of solar array technology to accommodate market changes, evolving technology, and to preserve design and layout flexibility.

The following description of major components is based on the best available design information at this time and may be modified in the ASC and later as part of final design:

- **Solar Modules.** Solar modules use bifacial mono- or poly-crystalline cells to generate electricity by converting sunlight energy into direct current (DC) electrical energy. The electrical generation from a single solar module will vary by module size and the number of cells per module. The modules used in current preliminary site design have a nameplate rating of 690 watts, and dimensions of each module will be approximately 6 to 8 feet long and 4 to 5 feet wide. Solar modules consist of antireflective glass, a metal frame, and wire connectors. The solar modules will be connected in strings. The module strings are connected via cables and combiner boxes. The configuration of strings (the solar array) can vary depending on the equipment type and topography. The actual number of modules used will vary depending on the module technology, spacing, mounting equipment, and other design criteria, which are subject to change during final design.

- **Tracker Systems and Posts.** Strings of solar modules will be mounted on fixed-tilt or single-axis tracker systems. The single-axis trackers optimize electricity production by rotating the solar modules to follow the path of the sun. The length of each tracker string may vary by topography and the number of modules that the tracker can hold. The drive unit for the single-axis tracking system can control a single string or multiple strings of modules through a series of mechanical linkages and gearboxes. As the solar modules tilt throughout the day, the height of their top edges will shift accordingly, up to a maximum top edge height of 12 feet off the ground. The tracker system, and associated posts, will be specifically designed to withstand wind, snow, and seismic loads anticipated at the site.

Each tracker will be supported by multiple driven steel posts, which could be round hollow posts, or pile-type posts (i.e., H-pile, C-pile, S-pile). Post depth may vary depending on soil conditions, but the posts are typically installed 4 to 10 feet below the surface and protrude approximately 4 to 10 feet above grade. Post locations will be determined by the final layout of the tracker system and geotechnical investigations of the solar array area within the Facility site boundary prior to final design.

- **Inverters.** DC collected from the solar modules will be converted into AC before connecting to the Facility's collector substations. Low-voltage cabling will link each solar module to the inverters and transformers. Inverters serve the function of converting DC power supply to an AC power supply in accordance with electrical requirements. The number of inverters will vary depending on the final solar array layout. The inverter specifications will comply with applicable requirements of the National Electrical Safety Code and Institute of Electrical and Electronics Engineers standards.

- **Transformers.** The AC from the inverters is routed to transformers that will increase the output voltage from the inverter to the desired Facility collector substation feed voltage of 34.5 kV. The transformers could be collocated with the inverters and could be centrally located within the Facility site boundary or dispersed throughout the solar array. The number of transformers will vary depending on the final solar array layout and transformer specifications will comply with applicable requirements of the National Electrical Safety Code and Institute of Electrical and Electronics Engineers standards.
- **Cabling.** Solar modules generate DC electricity. Cables collect and aggregate the DC before it is converted to AC and sent to the Facility collector substations. Low-voltage cabling will connect the solar modules of each tracker string in a series and combine multiple strings to a single combiner box. Cabling from multiple combiner boxes will connect to a single inverter, which will convert the DC to AC and connect to the buried collection system. Cabling can be mounted to the tracker system, placed in cable trays, or buried. Cable associated with the solar array will be located within the solar perimeter fence line, within the Facility site boundary.
- **Collection System.** The inverters and transformers will connect the generation output of the solar array to 34.5-kV medium-voltage collector lines which may be underground or on poles. Where underground, the medium-voltage collector lines will be buried to a minimum depth of 2 feet. If overhead, the collector lines will be supported by wooden or steel pole structures. Locations and dimensions of medium-voltage collector lines will not be known until the project is more advanced. The 34.5-kV collector lines will be routed to several project substations where transformers will again step the energy up to a higher voltage to more efficiently transmit the power to the Facility's POI on the BPA transmission system. The specific details of this portion of the Facility's electrical infrastructure are still being worked out, and more detailed information will be submitted with the ASC.

(iii) Methods for waste management and waste disposal, including, to the extent known, the amount of wastewater the applicant anticipates, the applicant's plans for disposal of wastewater and storm water, and the location of disposal;

Response:

The Facility will not use water in the generation of electricity or produce wastewater for disposal. The Facility will not generate significant quantities of solid waste. Waste and recyclable products will be hauled offsite and disposed of at licensed waste management facilities. The proposed operations and maintenance (O&M) building will contain a kitchen and bathroom, with a septic system to support the building. Required permits to construct the septic system will be obtained from Sherman County and the Oregon Department of Environmental Quality (ODEQ). Further details of stormwater drainage and wastewater disposal during construction and operations are provided in Exhibit K.

(iv) For thermal power plants, combustion turbine power plants, or other facilities designed to generate electricity from any gas, liquid, or solid fuels:

(I) A discussion of the source, quantity and availability of all fuels proposed to be used in the facility to generate electricity or useful thermal energy;

(II) If the facility will generate electric power from natural gas, petroleum, coal or any form of solid, liquid or gaseous fuel derived from such material, a discussion of methods the facility will use to ensure that the facility does not emit greenhouse gasses into the atmosphere, and a description of any equipment the facility will use to capture, sequester, or store greenhouse gases;

(III) A discussion of the methods for the disposal of waste heat generated by the facility;

Response:

The Facility is not a thermal power plant, combustion turbine power plant, or other facility designed to generate electricity from any gas, liquid, or solid fuels. The Facility will generate solar power; consequently, no waste heat will be generated.

(v) For transmission lines, approximate transmission line voltage, load carrying capacity and type of current;

Response:

The Facility does not include a transmission line that, by itself, is an energy facility under the definition in ORS 469.300(11)(a)(C). The Facility will include various collector lines that will transport power to the central switchyard/substation (where the power will be stepped up to interconnection voltage) located at the POI. Additional details about the internal collection line system is provided below.

(vi) For pipelines, approximate operating pressure and delivery capacity in thousand cubic feet per day;

Response:

The Facility is not a pipeline.

(vii) For surface facilities related to underground gas storage, estimated daily injection and withdrawal rates, horsepower compression required to operate at design injection or withdrawal rates, operating pressure range and fuel type of compressors;

Response:

The Facility does not involve underground gas storage.

(viii) For facilities to store liquefied natural gas, the approximate volume, maximum pressure, liquefaction and gasification capacity in thousand cubic feet per hour;

Response:

The Applicant does not propose the storage of liquefied natural gas.

(B) A description of major components, structures and systems of each related or supporting facility; and

Response:

The Facility's related or supporting facilities will consist of the BESS; collector substations, collector lines, O&M building; site access, service roads, perimeter fencing, and gates; temporary construction areas; and temporary workforce housing. The following descriptions are based on the best available information at this time and may be modified in the ASC and at final design prior to construction:

- **Battery Energy Storage System.** The Facility includes an up-to-500 MW of alternating current (AC) BESS with an 8-hour duration. The BESS will be located in the south-central portion of the site boundary, near the Facility's POI. The BESS is capable of storing and later deploying energy generated by the Facility and/or charging and discharging directly from and to the grid. The Applicant anticipates using lithium-ion technology for the BESS. The batteries are anticipated to be housed in a series of self-contained enclosures located on concrete pads within a centralized fenced area.
- **Collector Substations.** Four to six collector substations will be constructed to support the proposed Facility and will be located within the Facility site boundary. Prior to construction, the collector substation sites will be cleared and graded, with a bed of crushed rock applied for a durable surface. The collector substations are anticipated to consist of transformers, collector line termination structures, a bus bar, circuit breakers and fuses, control systems, meters, communications equipment and other equipment that will be determined at final design.
- **Collector Lines.** The Facility will include multiple collector lines at various voltages to route output from the inverters to the collector substations and then on to the central switchyard/substation. Collector substations will step up from 34.5 kV to either 230 kV or 500 kV. These higher voltage collector lines will likely be supported by H-frame structures with two steel or wood poles or by a steel or wood monopole structure and will transport power to the central switchyard/substation located at the POI. The central substation will then step up to the interconnection voltage of the BPA transmission system. The specific details of the Facility's electrical infrastructure will be submitted with the ASC. The collector lines will be entirely within the Facility site boundary.
- **Central Switchyard/Substation.** One central switchyard/substation will be located adjacent to the POI, which will be at the new BPA switchyard (Figure 2). Prior to

construction, the central switchyard/substation site will be cleared and graded, with a bed of crushed rock applied for a durable surface. The central substation is anticipated to consist of transformers, collector line termination structures, a bus bar, circuit breakers and fuses, control systems, meters, and other equipment that will be determined at final design.

- **O&M Building.** The Facility will include one O&M building and several O&M storage containers, located on approximately 3 acres. The O&M building will be one-story, prefabricated, and approximately 2,000 square feet in size. The O&M building may include bathrooms, a kitchen, offices, and meeting rooms. The O&M storage containers will be 40-foot Connex structures. Graveled parking and a storage area for employees, visitors, and equipment will be located adjacent to the O&M building. The building will have bathroom(s) and a kitchen, with water supplied by on-site wells or nearby municipal facilities with existing water rights. It will also have a septic system, and power will be supplied by a local service provider using overhead and/or underground distribution lines.
- **Site Access, Service Roads, Perimeter Fencing, and Gates.** The Facility will utilize existing access roads to the extent practicable. Primary transportation corridors to the Facility include Interstate 84 (I-84), U.S. Route 97 (US-97) and Sherman County local roads. The bulk of the site is accessible from OR-97 via North Street/Blagg Lane. Corridors between module racking will be at least 10 feet wide and racking will be at least 10 feet from perimeter fencing or more where necessary to comply with setback requirements. Some new road construction will be required to access site features. Roads will be compacted gravel and typically 16 feet in width, with some exceptions, including access to the substations and main travel corridors where two-way traffic is required. In these cases, roads will be 20 feet wide. Vegetation will be maintained along solar array interior roads. Perimeter fencing will enclose the solar array as well as other infrastructure. The perimeter fencing will be 7 feet in height and have lockable vehicle access gates.
- **Temporary Construction Areas.** Temporary construction areas will be needed for development of the proposed Facility to facilitate the delivery and assembly of materials and equipment. These temporary construction areas may contain temporary storage of diesel and gasoline fuels located in aboveground tanks and within designated secondary containment areas. The temporary construction areas will be within the Facility site boundary.
- **Temporary Workforce Housing.** The Applicant is considering options for incorporating temporary workforce housing. If the Applicant determines that the provision of temporary housing may be needed and it would be feasible to provide temporary housing at the Facility site, this will be described in the ASC.

(C) The approximate dimensions of major facility structures and visible features.

Response:

Preliminary estimates of dimensions for major Facility structures are summarized below and will be updated in the ASC and prior to construction at final design. The ASC will assess the maximum anticipated impacts of Facility structures and visible features.

- **Solar Array.** The solar modules will be connected in strings. The top edge of the solar module when fully tilted will be approximately 12 feet off the ground. The exact number and size of modules, layout, and associated equipment specifications will be determined as part of final design.
- **BESS.** The lithium-ion batteries are anticipated to be housed in a series of self-contained enclosures measuring approximately 8 to 10 feet wide, 40 feet long, and 7 to 10 feet tall and located on a concrete pad within an approximately 50-acre centralized area, likely near the Facility's POI. Each container holds the batteries, a supervisory and power management system, and a fire prevention system. Cooling units will be placed either on top of the containers or along the side, depending on the equipment selected at final design.
- **Collector Substations.** Four to six collector substations will be used for the proposed Facility and will be located within the Facility site boundary. Each collector substation will be located on an approximately 2- to 5-acre area and will be enclosed by a locked chain-link fence.
- **Collector Lines.** Each collector substation will have collector lines running from the Facility's inverters and will also have a high voltage collector line running to the central switchyard/substation within a corridor up to 150 feet wide. The higher voltage collector lines will likely be supported by H-frame structures with two steel or wood poles or by a steel or wood monopole structure. These collector line structures will be less than 100 feet above grade. The specific quantity, locations, and dimensions of the collector lines will be determined as the Facility design progresses. These lines will be within the Facility site boundary and connect the collector substations to the central substation.
- **Central Switchyard/Substation.** The Facility will include one central switchyard that may or may not include transformers. It will include numerous circuit breakers and tie together all of the collector lines from the various collector substations to connect the Facility to the new BPA switchyard along the existing BPA 500-kV Ashe-Marion Transmission Line. The central substation will be located on an approximately 5- to 10-acre area and will be enclosed by a locked chain-link fence. It will be located adjacent to the new BPA switchyard.
- **O&M Building.** The O&M building will be a one-story structure, approximately 2,000 square feet in size. The O&M storage containers will be 40-foot Connex structures. A permanent graveled parking and storage area for employees, visitors, and equipment will be located adjacent to the O&M building.

- **Temporary Construction Areas.** Temporary construction areas will occur within the Facility site boundary and further described in the ASC. If a temporary concrete batch plant is needed, it will be located within a temporary construction area.

Exhibit C. Facility Location – OAR 345-020-0011(1)(c)

(c) Exhibit C. A description of the location of the proposed energy facility site and the proposed site of each related or supporting facility and all areas that might be temporarily disturbed during construction of the facility, including the approximate land area of each.

Response:

The Facility site boundary includes approximately 8,782 acres of privately owned land in Sherman County, Oregon. The Facility is generally bounded by the John Day River to the east, OR-97 to the west, Rutledge Road to the south, and Crites Road to the north. The site boundary encompasses the Township, Range, and Sections listed in Table C-1.

Table C-1. Township, Range, and Sections within the Facility Site Boundary

Township and Range	Section
T02S R16E	36
T02S R17E	3, 4, 5, 9, 10, 11, 14, 15, 21, 22, 23, 26, 27, 28, 29, 31, 32, 34, 35
T03S R17E	2

Exhibit D. Alternative Locations – OAR 345-020-0011(1)(d)

(d) Exhibit D. If the proposed energy facility is a pipeline or a transmission line or has, as a related or supporting facility, a transmission line or pipeline that, by itself, is an energy facility under the definition in ORS 469.300, identification of at least two proposed corridors, as defined in OAR 345-001-0010, or identification of a single proposed corridor with an explanation of why alternate corridors are unlikely to better meet the applicant's needs and satisfy the Council's standards. The applicant must include an explanation of the basis for selecting the proposed corridors and, for each proposed corridor, the information described in subsections (e), (g), (i), (j), (k), (L), (o) and (q) that is available from existing maps, aerial photographs, and a search of readily available literature.

Response:

The Facility is not a pipeline, nor a transmission line as defined by ORS 469.300(a)(C). The Facility also does not include a related or supporting facility a pipeline or transmission line that alone would be considered an energy facility under ORS 469.300(11)(a)(C).

Exhibit E. Permits Needed for Construction and Operation – OAR 345-020-0011(1)(e)

(e) Exhibit E. Identification of all federal, state and local government permits related to the siting of the proposed facility, a legal citation of the statute, rule or ordinance governing each permit, and the name, address, email address and telephone number of the agency or office responsible for each permit. For each permit, the applicant must provide a preliminary analysis of whether the permit should or should not be included in and governed by the site certificate.

Response:

Table E-1 identifies the applicable federal, state, and local permits required for construction and operation of the Facility.

Table E-1. Permits or Other Approvals Required for Construction and Operation of the Facility

Permit	Agency	Authority/Description
Federal Permits		
Notice of Proposed Construction or Alteration (Form 7460-1)	Federal Aviation Administration (FAA) Attn: Dan Shoemaker Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Ave SW Renton, WA 98057 (425) 227-2791 Dan.shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 Code of Federal Regulations (CFR) § 77 Description: The Applicant proposes construction or alterations that may affect navigable airspace pertaining to potential glare from the Facility’s solar arrays, or for construction of structures within specified distances of runways or helipads, and may be required to file this notice. No permit is issued by the FAA. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.
Supplemental Notice of Actual Construction or Alteration (Form 7460-2)	FAA Attn: Dan Shoemaker Airspace Specialist Seattle Obstruction Evaluation Group 1601 Lind Ave SW Renton, WA 98057 (425) 227-2791 Dan.shoemaker@faa.gov	Federal Aviation Act of 1958 (14 USC § 44718); 14 CFR § 77 Description: If a Notice of Proposed Construction or Alteration with the FAA is required, then submission of the Supplemental Notice of Actual Construction or Alteration form must be filed within 5 days after construction reaches its greatest height as specified in the No Hazard Determination. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Clean Water Act, Section 404	U.S. Army Corps of Engineers, Portland District Attn: Danielle Erb, Sherman County Contact PO Box 2946 Portland, OR 97208-2946 (503) 808-4368 danielle.h.erb@usace.army.mil	Clean Water Act, Section 404 (33 USC § 1344); 33 CFR §§ 320, 323, 325-28, and 330 Description: A Section 404 permit will be required if dredge or fill occurs in waters of the United States. This federal process is not within the jurisdiction of EFSC and therefore should not be included in the site certificate.
Record of Decision/ National Environmental Policy Act Compliance	BPA Attn: Laura Green, Manager PO Box 3621 Portland, OR 97208-3621 (360) 418-8633 legreen@bpa.gov	National Environmental Policy Act (NEPA), Section 102 (42 United States Code [USC] § 4332); 40 CFR § 1500 Description: Interconnection to BPA's transmission system is subject to review under NEPA. BPA will lead this process as a separate action from the solar facility site certificate process. This federal process is not within the jurisdiction of the Oregon Energy Facility Siting Council (EFSC) and therefore should not be included within the site certificate.
State Permits		
Energy Facility Site Certificate	Oregon Department of Energy and Energy Facility Siting Council (EFSC) Attn: Todd Cornett, Assistant Director 550 Capitol Street NE Salem, OR 97301 (503) 428-2962 todd.cornett@oregon.gov	ORS 469.300 et seq.; Oregon Administrative Rules (OAR) Chapter 345, Divisions 1, 21-24 Description: This site certificate is the subject of this NOI.
State Electrical Permit	Oregon Department of Consumer & Business Services, Building Codes Division Attn: Chrys Wernlund, Katherine Denight Pendleton Field Office 800 SE Emigrant Avenue, Suite 360 Pendleton, OR 97801 (541) 276-7814 building.department@dcbs.oregon.gov	OAR 918, Division 309 A state electrical permit is required prior to the installation of electric, phone, or cable service to any Facility infrastructure. Electrical permits may be obtained in person at the Building Codes Division Pendleton office, or online through the state's e-permitting system (available at: https://aca-oregon.accela.com/oregon/Default.aspx). A state electrical permit will be obtained by the construction contractor prior to construction of each component for which electrical, phone, or cable service will be required and therefore should not be included in or governed by the site certificate.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Archaeological Excavation Permit	Oregon Parks and Recreation Department, State Historic Preservation Office Attn: Koren Tippett, Archaeology Inventory & Survey Coordinator 725 Summer Street NE, Suite C Salem, OR 97301 (971) 304-4737 arch.permits@opr.d.oregon.gov	ORS Chapter 97, 358, and 390; OAR Chapter 736, Division 51 Description: Ground-disturbing activity that may affect a known or unknown archaeological resource on public or private lands requires a permit issued by the Oregon Parks and Recreation Department. If needed, the Applicant will obtain this permit from the State Historic Preservation Office and therefore this permit should not be included in or governed by the site certificate.
Water Right Permit or Water Use Authorization	Oregon Water Resources Department Water Rights Section, District 3 Attn: Robert Wood, Watermaster 2705 E 2 nd Street The Dalles, OR 97058 (541) 506-2652	ORS 537; OAR 690 Divisions 310, 340, and 410 Description: If water for construction is not available from permitted sources, the Applicant will obtain the necessary water right permit or use authorization directly from the Oregon Water Resources Department. It is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
Permit to Occupy or Perform Operations Upon a State Highway	Oregon Department of Transportation (ODOT) Attn: ODOT Utility and Miscellaneous Permit Specialist ODOT District 9 3313 Bret Clodfelter Way The Dalles, OR 97058 (541) 296-2215	OAR Chapter 734, Division 55 (Pole Lines, Buried Cables, and Miscellaneous Operations) Description: Utility installations within the right-of-way of a state highway in Oregon require a permit issued by the ODOT. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.
Access Management Permit	ODOT Attn: ODOT Utility and Miscellaneous Permit Specialist ODOT District 9 3313 Bret Clodfelter Way The Dalles, OR 97058 (541) 296-2215	OAR Chapter 734, Division 51 Description: Access from Oregon state highways will require an access permit, which may be issued by the local ODOT District Offices. If needed, the Applicant's third-party contractor will obtain this permit directly from ODOT and therefore this permit should not be included in or governed by the site certificate.
Oversize Load Movement Permit/Load Registration	ODOT Attn: Gary Farnsworth, Region 4 Manager Region 4 Headquarters 63055 N Highway 97 Bend, OR 97703 (541) 388-6071	ORS 818.030; OAR Chapter 734, Division 82 Description: Authorization for oversized loads. Movement of construction cranes and other equipment and materials may require this permit. If needed, the Applicant's third-party contractor will obtain this permit and load registration from ODOT and therefore this permit should not be included in or governed by the site certificate.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Air Contaminant Discharge Permit (ACDP)	Oregon Department of Environmental Quality (ODEQ), Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	OAR Chapter 340, Division 216 Description: A Basic ACDP authorizes the operation of a stationary or portable concrete manufacturing plant that produces more than 5,000 but less than 25,000 cubic yards per year output. If a stationary or portable concrete manufacturing plant is required for Facility construction, the Applicant's third-party contractor will obtain a Basic ACDP from ODEQ. This permit is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
Water Pollution Control Facilities (WPCF) Permit, WPCF-1000, Gravel Mining and Batch Plant	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	OAR Chapter 340, Division 45 Description: A WPCF-1000 authorizes the permittee to operate a wastewater collection, treatment, control, and disposal system for sand, gravel, and other nonmetallic mineral quarrying and mining operations, including asphalt-mix batch plants, concrete batch plants, and other related activities. If a temporary batch plant is needed for Facility construction, the Applicant's third-party contractor will obtain a WPCF-1000 permit from ODEQ, which would therefore not be included in or governed by the site certificate.
General Water Pollution Control Facilities Permit, WPCF-1700-B	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	ORS 468B; OAR Chapter 340, Division 45 Description: If solar panel washing is determined to be needed, the Applicant or a third-party contractor who will conduct the solar panel washing activities may seek coverage under the WPCF-1700-B permit from ODEQ following completion of construction and before initiating washing activities. Therefore, this permit should not be included in or governed by the site certificate.
401 Water Quality Certification	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	Clean Water Act, Section 401 (33 USC § 1341); OAR Chapter 340, Division 48 Description: Water quality certification is required for facilities that are processed under the U.S. Army Corps of Engineers Section 404 Nationwide Permits. The Facility is not anticipated to impact jurisdictional waters and/or wetlands of the United States. The Applicant will obtain this permit, if needed, directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit 1200-C	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45 Description: The NPDES 1200-C permit is required for construction activities that will disturb one or more acres of land. The Applicant will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
NPDES Stormwater Discharge Permit 1200-A	ODEQ, Eastern Region Attn: Patty Isaak, Permit Coordinator 800 SE Emigrant Ave, Suite 330 Pendleton, OR 97801 (541) 276-4063	Clean Water Act, Section 402 (33 USC § 1342); 40 CFR § 122; ORS 468 and 468B; OAR Chapter 340, Division 45 Description: The NPDES 1200-A permit is required for concrete and asphalt mix batch plants which discharge stormwater to surface water. If needed, the Applicant or a third-party contractor will obtain this permit directly from ODEQ as it is outside the jurisdiction of EFSC and should not be included in or governed by the site certificate.
Removal-Fill Permit	Oregon Department of State Lands Attn: Richard Fitzgerald, Removal Fill 1645 NE Forbes Rd., Suite 112 Bend, OR 97701 (541) 388-6112 richard.w.fitzgerald@dsl.oregon.gov	ORS 196; OAR Chapter 141, Division 85 Description: A Removal-Fill permit is required if 50 cubic yards or more of material is removed, filled, or altered within a jurisdictional water of the state. The Facility is not anticipated to impact jurisdictional waters and/or wetlands of the state. If this is proposed or needed, the Removal-Fill Permit should be included in and governed by the EFSC site certificate under ORS 469.401(3).
Local Permits		
Conditional Use Permit (CUP), Goal 3 Comprehensive Plan Amendment	Sherman County Planning Department Attn: Georgia Macnab, Planning Director Sherman County Planning Department P.O. Box 381 Moro, OR 97039 (541) 565-3601 gmacnab@co.sherman.or.us	Sherman County Zoning Ordinance (SCZO) Section 3.1, Exclusive Farm Use, F-1 Zone; SCZO Section 5.2, General Criteria; SCZO Section 5.4, Application for Conditional Use; SCZO Section 5.8, Standards Governing Specific Conditional Uses; SCZO Section 11.2, Zoning or Other Land Development Permit or Approval. Description: The Applicant elects to obtain an EFSC determination under ORS Chapter 469.504(1)(b). Under ORS 469.401(3), following issuance of the site certificate, the County, upon the Applicant's submission or the proper application and fee, shall issue the permits addressed in the site certificate, subject only to the conditions set forth in the site certificate and without hearings or other proceedings.

Notice of Intent to Apply for a Site Certificate

Permit	Agency	Authority/Description
Road Approach Permit	Sherman County Road Department Attn: Mark Coles, Road Master P.O. Box 365 Moro, OR 97039 (541) 565-3271 mcoles@co.sherman.or.us	SCZO Article 5 Conditional Uses Description: New driveways and increases or changes of use for existing driveways which access a public road shall obtain a Road Approach Permit from Sherman County Road Department or ODOT.
Site Evaluation Application & New Construction Permit (Septic)	North Central Public Health District Onsite Wastewater Program 419 E 7th St, The Dalles, OR 97058 (541) 506-2600 publichealth@ncphd.org	ORS 454 and 468B; OAR Chapter 340, Division 71 (340-071-0120(1) allows ODEQ to delegate authority to local governmental units) Facilities with an on-site sewage disposal system must obtain a Site Evaluation & New Construction Permit before construction. The Facility will have a daily sewage flow of fewer than 2,500 gallons and the Applicant's third-party contractor will obtain the permit from North Central Public Health District and Wasco County for the O&M building. Therefore, this permit should not be included in or governed by the site certificate.
Building Permit	State of Oregon Building Codes Pendleton Field Office Attn: Katherine Denight, Permit Technician 800 SE Emigrant Ave, Ste. 360 Pendleton, OR 97801 (541) 276-7814 Building.department@dcb.oregon.gov	OAR Chapter 918, Divisions 309 & 780; Oregon Structural Specialty Code Description: In Sherman County building permits are administered by the State of Oregon Building Codes Pendleton Field Office. A building permit is required for review and approval prior to commencement of construction of energy facilities. Again, these are applied for an issued by the State of Oregon Building Codes Pendleton Field Office.

Exhibit F. Property Ownership – OAR 345-020-0011(1)(f)

(f) Exhibit F. A list of the names and mailing addresses of property owners, as described in this rule:

(A) The list must include all owners of record, as shown on the most recent property tax assessment roll, of property located:

(i) Within 100 feet of property which the subject of the NOI, where the subject property is wholly or in part within an urban growth boundary;

(ii) Within 250 feet of property which is the subject of the NOI, where the subject property is outside an urban growth boundary and not within a farm or forest zone; or

(iii) Within 500 feet of property which is the subject of the NOI, where the subject property is within a farm or forest zone; and

(B) In addition to incorporating the list in the NOI, the applicant must submit the list to the Department in an electronic format acceptable to the Department.

Response:

In accordance with OAR 345-020-0011(1)(f), Attachment 2 is a list of the names and mailing addresses of property owners within 500 feet of the Facility's site boundary. The Facility is located in the Sherman County Exclusive Farm Use, F-1 (F-1) zone (Figure 3). Therefore, OAR 345-020-0011(1)(f)(A)(iii) applies to the Facility. Additionally, the Applicant has provided an electronic list of the property owner information to ODOE in accordance with OAR 345-020-0011(1)(f)(B). Tax lot boundaries and assessor information for Sherman County was obtained from the Sherman County Assessor on July 2, 2024.

Exhibit G. Facility Maps – OAR 345-020-0011(1)(g)

(g) Exhibit G. A map or maps showing:

(A) The proposed locations of the energy facility site, all related or supporting facility sites and all areas that might be temporarily disturbed during construction of the facility in relation to major roads, water bodies, cities and towns, important landmarks and topographic features;

Response:

The components of each figure addressing the above criteria are listed below:

- **Figure 1** shows the vicinity of the Facility site boundary in relation to county boundaries, major roads, highways, cities, and towns.
- **Figure 2** is an overview of the Facility layout in relation to the surrounding area.
- **Figure 3** shows the underlying zoning designation for the Facility. The site boundary is within Sherman County's F-1 zone.
- **Figure 4** identifies the study areas and their associated mileage, as defined by OAR 345-001-0010(35).
- **Figure 5** shows the topographic features of the area within and surrounding the proposed site boundary. Local roads are also shown.
- **Figure 6** identifies the federal, state, and local protected areas as defined by OAR 345-001-0010(26), within a 20-mile buffer of the proposed site boundary.
- **Figure 7** shows hydrology and wetland data within the vicinity of the Facility from the National Wetlands Inventory (NWI) and National Hydrography Dataset (NHD).
- **Figure 8** shows the permitted energy facilities within 10 miles of the proposed site boundary. Additionally, major roads, existing transmission lines, and existing substations are shown on the figure.

(B) The proposed locations of the corridors the applicant has identified under subsection (d) in relation to major roads, water bodies, cities and towns, important landmarks and topographic features;

Response:

As previously mentioned, the Facility is not a pipeline or transmission line as defined under OAR 469.300. Additionally, the Facility is not proposing a pipeline or transmission line that would be

considered an energy facility. Therefore, alternate corridors were not identified for the Facility under subsection (d).

(C) The study areas for the proposed facility as defined in OAR 345-001-0010;

Response:

As shown on Figure 4, the study areas defined under OAR 345-001-0010(35) include the area within the site boundary and the area within the following distances from the site boundary: a 20-mile protected areas buffer; a 10-mile scenic resources and public services area; a 5-mile recreational opportunities area; a 5-mile threatened and endangered plant and animal species area; and a 0.5-mile area for land use, wildfire risk, and fish and wildlife habitat.

(D) The topography of the study areas including streams, rivers, lakes, major roads and contour lines;

Response:

Figure 5 depicts topographic features, local roads, and contour lines for areas within and adjacent to the proposed site boundary.

(E) All protected areas in the study area as defined in OAR 345-001-0010 for impacts to protected areas;

Response:

Figure 6 shows protected areas defined under OAR 345-001-0010.

(F) The location of any potential waters of the state or waters of the United States that are on or adjacent to the site; and

Response:

Figure 7 shows potential waters of the state and potential waters of the United States using data from the NWI and NHD. Intermittent streams cross through and around the proposed site boundary as indicated by NHD; the site boundary also contains several small areas categorized as lake/pond. The NWI identified a few small freshwater ponds and emergent wetlands within the Facility site boundary, and several small areas of freshwater emergent wetland were identified outside the Facility site boundary.

(G) For energy generation facilities, the approximate locations of any other energy generation facilities that are known to the applicant to be permitted at the state or local level within the study area as defined in OAR 345-001-0010 for impacts to public services.

Response:

The Hay Canyon, Golden Hills, and Klondike III wind energy generation facilities are permitted under EFSC and located within 10 miles of the proposed site boundary, as shown on Figure 8. Existing transmission lines and substations are also within 10 miles of the Facility. No other existing energy generation facilities have been identified within 10 miles of the Facility.

Exhibit H. Non-generating Energy Facility – OAR 345-020-0011(1)(h)

(h) Exhibit H. If the proposed facility is a non-generating energy facility for which the applicant must demonstrate need under OAR 345-023-0005, identification of the rule in division 23 of this chapter under which the applicant intends to demonstrate need and a summary statement of the need and justification for the proposed facility.

Response:

The Facility is not a non-generating energy facility. Therefore, this rule is not applicable.

Exhibit I. Land Use – OAR 345-020-0011(1)(i)

*(i) **Exhibit I.** A statement indicating whether the applicant intends to satisfy the Council's land use standard, OAR 345-022-0030, by obtaining local land use approval under ORS 469.504(1)(a) or by seeking a Council determination under ORS 469.504(1)(b).*

Response:

The proposed Facility site boundary is within Sherman County's F-1 zone (Figure 3). The Applicant intends to satisfy EFSC's land use standard, OAR 345-022-0030, by seeking an EFSC determination under ORS 469.504(1)(b). The Applicant seeks a determination by EFSC of compliance with Sherman County's land use standards for the Facility.

Exhibit J. Environmental Impacts – OAR 345-020-0011(1)(j)

(j) Exhibit J. Identification of potential significant environmental impacts of construction and operation of the proposed facility on resources in the study areas, including those impacts affecting air quality, surface and ground water quality and availability, wildlife and wildlife habitat, threatened and endangered plant and animal species, historic, cultural and archaeological resources, scenic resources, recreation opportunities, land use, and wildfire risk.

Response:

Potential significant environmental impacts of the Facility on air quality, surface and groundwater quality, fish and wildlife habitats, threatened and endangered plant and animal species, historic, cultural and archeological resources, scenic and protected resources, recreation, land use, and wildfire risk are identified in this exhibit. The applicable study areas for these resources are shown below in Table J-1.

Table J-1. Study Areas for Environmental Impacts

Resource	Study Area	Regulatory Requirement
Air Quality	Facility site boundary	Not applicable
Surface and Groundwater Quality and Availability (includes wetlands and waters of the state)	Facility site boundary	Not applicable
Fish and Wildlife Habitat	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)
Threatened and Endangered Plant and Animal Species	5 miles from Facility site boundary	OAR 345-001-0010(35)(a)
Historic, Cultural and Archaeological Resources	Facility site boundary	Not applicable
Scenic Resources	10 miles from Facility site boundary	OAR 345-001-0010(35)(b)
Recreation	5 miles from Facility site boundary	OAR 345-001-0010(35)(d)
Land Use	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)
Wildfire Risk	0.5 miles from Facility site boundary	OAR 345-001-0010(35)(c)

Air Quality

The primary sources of air pollution during construction and operation of the Facility are pollutants from vehicle emissions and fugitive dust. Due to the clean energy nature of the Facility, the solar modules, collector lines, BESS, and related and supporting components will not produce air contaminants and therefore will not have a negative impact on air quality in the area. Vehicles traveling to and from the site during construction will include trucks carrying various materials and

employees commuting to the site, which can generate fugitive dust as they travel across unpaved gravel roads. Best management practices for dust control will be discussed in the ASC, and will be implemented during construction to minimize potential impacts from dust.

Due to the mobile, temporary, and non-point sources of dust generated by vehicles, this type of emission does not require air quality permitting. Facility-related vehicles, workers' vehicles, and delivery vehicles are subject to registration and emissions regulations administered by ODOT and the U.S. Department of Transportation. Additionally, Facility construction equipment is subject to the federal non-road engine standards in 40 CFR Part 89 (National Archives 2023), which establish maximum emission rates for compression ignition non-road engines by model year.

Surface and Groundwater

Surface and Groundwater Quality

Pollutants will not be discharged from the Facility to surface water or groundwater. The Applicant will obtain a NPDES 1200-C permit from ODEQ to address potential impacts from construction stormwater runoff. The NPDES 1200-C permit will include an Erosion and Sediment Control Plan to minimize impacts from stormwater runoff. If a temporary concrete batch plant is needed for construction, the Facility will also obtain NPDES 1200-A and WPCF-1000 permits from ODEQ to address potential discharges.

During construction, employees will use on-site portable toilets; waste will be disposed of off-site by a licensed contractor. During operation, the O&M building will be served by a septic system and water is anticipated to be provided by on-site wells or nearby municipalities with existing water rights.

Surface and Groundwater Availability

Approximately 250 million gallons of water will be required over the course of construction, mostly for access road and earthwork compaction and dust suppression. Actual daily water use will vary depending on weather and the final construction schedule. For example, water usage for dust control will be greater during the dry, windy conditions of summer than at other times of year. Water is anticipated to come from wells on-site or from nearby municipalities with existing water rights. The expected water amounts used for construction of the Facility will be further refined and discussed in the ASC. Additionally, the Applicant will confirm with the appropriate municipality that the anticipated amount of water needed for construction of the Facility will be available. Water use during construction is not expected to injure any existing surface or groundwater availability or exceed the amount of water available for beneficial use within the watersheds on which the Project is located. During operations, the Applicant anticipates water to be obtained from on-site wells in amounts exempted under ORS 537.545 or from nearby municipalities with existing water rights. Generally, water during operation will be used for washing solar panels and Facility vehicles, and

within the O&M building. The average amount of water used for the Facility will be less than 5,000 gallons per day during operations and, therefore, will not require a new water right.

Wetlands and Waters of the State of Oregon

Figure 7 identifies potential wetlands and waters of the United States using data from the NWI and NHD. Intermittent streams cross through and around the proposed site boundary as indicated by NHD; the site boundary also contains several small areas categorized as lake/pond. The NWI identified a few small freshwater ponds and emergent wetlands within the Facility site boundary. An in-depth analysis of waters of the state, wetlands, and waters of the United States will be provided in the ASC. If any impacts may occur, they will be mitigated in accordance with state and federal law.

Wildlife and Wildlife Habitat

As shown in Table J-2, according to the National Land Cover Database, land cover within the Facility site boundary is primarily cultivated crops, shrub/scrub, and grassland/herbaceous (MRLC 2021). The site boundary also contains areas of emergent herbaceous wetlands, evergreen forest, pasture/hay, and developed land and open space.

Table J-2. Land Cover within the Facility Site Boundary

Land Cover Type	Area (acres)¹	Percent of Total Area¹
Cultivated Crops	5,228	60
Developed High Intensity	1	0.01
Developed, Low Intensity	14	0.16
Developed, Medium Intensity	13	0.14
Developed, Open Space	172	2
Emergent Herbaceous Wetlands	3	0.03
Evergreen Forest	2	0.03
Grassland/Herbaceous	891	10
Pasture/Hay	1	0.01
Shrub/Scrub	2,458	28
Total	8,782	100

1. Values may not add up to the total due to rounding.

The Applicant will complete wildlife surveys to determine what species are present within the site boundary. These surveys will assess habitat functions and values present to support wildlife within the Facility site boundary. Habitat surveys will be guided by the Oregon Department of Fish and Wildlife (ODFW) Fish and Wildlife Habitat Mitigation Policy ([OAR] 635-415-0025), which defines six habitat quality categories ranging from Category 1 habitat (i.e., essential, limited, and

irreplaceable habitat) to Category 6 habitat (i.e., habitat that has low potential to become essential or important habitat for fish and wildlife). The ASC will provide a more in-depth analysis of specific species and their habitats.

Sensitive, Threatened, and Endangered Species

Biological surveys for special status wildlife and plant species will be conducted within the Facility site boundary in coordination with ODFW. A raptor and eagle nest survey will be conducted within the Facility site boundary and within a 0.5-mile buffer around the Facility site boundary. According to the Applicant's review of desktop resources, there is potential for two federally listed wildlife species to occur within or near the Facility site boundary: steelhead trout (*Oncorhynchus mykiss*, Middle Columbia distinct population segment, summer run; federally threatened), and bull trout (*Salvelinus confluentus*, Coastal Recovery Unit; federally threatened) (NMFS 2022). No state-listed wildlife species were documented within the Facility site boundary (USFWS 2021, ORBIC 2022). No area within the Facility site boundary is mapped by ODFW as winter range habitat for the mule deer (*Odocoileus hemionus*), or winter range habitat for the Rocky Mountain elk (*Cervus elaphus nelson*) (ODFW 2013, ODFW 2020). In addition, the Facility site boundary is mapped by ODFW as summer range for elk but not for mule deer.

Two state-listed plant species have been documented within the vicinity of the Facility site boundary: northern wormwood (*Artemisia campestris* var. *wormskioldii*, state endangered) and Lawrence's milkvetch (*Astragalus collinus* var. *laurentii*, state threatened) (ODA 2022). This information will help inform the wildlife, plant, and habitat surveys for the Facility.

Results of field surveys and analysis of potential impacts to sensitive, threatened, and endangered species will be provided in the ASC, along with measures to reduce any anticipated impacts to these species, if necessary.

Historic, Cultural, and Archaeological Resources

The Applicant will conduct cultural resource surveys within the Facility site boundary. These surveys will evaluate the presence or absence of historic properties of cultural resources that may or may not meet the threshold of significance necessary to qualify them as historic properties. Oregon State Historic Preservation Office study methodologies will be followed and be consistent with U.S. Secretary of Interior standards for cultural resource surveys under Section 106 of the National Historic Preservation Act (Public Law 89-665). The ASC will contain a detailed discussion of the potential impacts to potentially eligible resources and outreach and coordination with potentially affected Tribes.

Scenic Resources

As shown in Figure 4, the scenic resource study area is defined as the area within the Facility site boundary plus a 10-mile buffer, in accordance with OAR 345-001-0010(35)(b). Pursuant to OAR 345-021-0010(1)(r) and 345-022-0080, scenic resources to be considered and assessed are those “identified as significant or important in a land use management plan adopted by one or more local, tribal, state, regional, or federal government or agency applicable to lands within the analysis area for scenic resources.”

Local land use plans to be considered include the Sherman County Comprehensive Plan, Sherman County Zoning Ordinance, City of Grass Valley Comprehensive Plan, and any other local comprehensive plans and development codes for jurisdictions within 10 miles of the Facility site boundary. The Applicant will conduct a visual assessment of potentially significant visual impacts associated with construction and operation of the Facility. This assessment will be included in the ASC, and will contain proposed mitigation measures, if needed.

Recreational Opportunities

The recreational opportunities study area consists of the Facility site boundary plus a surrounding 5-mile buffer (Figure 4), in accordance with OAR 345-001-0010(35)(d). Generally, recreational activities in the study area include hunting, hiking, fishing, bicycling, and camping (County 2024a). Exhibit T in the ASC will provide a specific analysis of the impacts to recreational opportunities within the study area, including an evaluation for uniqueness and irreplaceability required by OAR 345-022-0100(2).

Land Use

In accordance with OAR 345-001-0010(35)(c), the study area for land use consists of the area within the Facility site boundary plus a surrounding 0.5-mile buffer. The area within the Facility’s site boundary is exclusively within Sherman County’s F-1 zone, as shown on Figure 3. The Applicant will address applicable review criteria for this zone and applicable overlay zones in Exhibit K of the ASC. Generally, land within the site boundary is used for crop cultivation and rangeland. The Facility is compatible with agricultural uses, and there are no significant impacts on surrounding land uses. Impacts to agricultural land will also be further discussed in Exhibit K of the ASC.

Wildfire Risk

The study area for wildfire risk consists of the area within the Facility site boundary plus a surrounding 0.5-mile buffer, in accordance with OAR 345-001-0010(35)(c). The Oregon Wildlife Risk Explorer shows the study area has a high to very high burn probability. Additionally, average flame lengths for the area generally range from 4 to 8 feet (ODF 2018). In addition to other fire management practices to be further specified in the ASC, water trucks will be on-site for dust

management and can provide water to support fire control if needed. Exhibit V of the ASC will provide a detailed analysis of baseline fire risk, seasonal fire risk, heightened risk area, and high fire consequence areas for the study area. The Applicant will coordinate with the South Sherman Rural Fire Protection District (RFPD) during ASC development and continue to do so through all stages of Facility development. If needed, the Applicant will develop and implement a Wildfire Mitigation Plan in compliance with OAR 345-022-0115(b).

Exhibit K. Community Service Impacts – OAR 345-020-0011(1)(k)

(k) Exhibit K. Information about significant potential adverse impacts of construction and operation of the proposed facility on the ability of communities in the study area to provide the services listed in OAR 345-022-0110.

Response:

Pursuant to OAR 345-001-0010(35)(b), the public services study area for impacts listed in OAR 345-022-0110 includes the Facility site boundary plus a surrounding 10-mile buffer. Public services that will be evaluated for potential impacts from the construction and operation of the Facility are as follows:

- Sewers and sewage treatment;
- Water;
- Storm water drainage;
- Solid waste management;
- Housing;
- Traffic safety;
- Police and fire protection;
- Health care; and
- Schools.

Sewers and Sewage Treatment

Sewage treatment in this rural area is limited to on-site septic systems. During construction, sanitary waste will be collected on-site in portable toilets that will be provided and maintained by a licensed subcontractor. The Applicant is proposing an O&M building that will contain a kitchen and bathroom. A septic system will be necessary to support the building. Required permits to construct the system will be obtained from Sherman County and ODEQ. The septic system will not rely on community services and will not cause significant adverse impacts to community sewer systems.

Water

Approximately 250 million gallons of water will be required, over the course of construction, mostly for access road and earthwork compaction and dust suppression. Actual daily water use will

vary depending on weather and the final construction schedule. For example, water usage for dust control will be greater during the dry, windy conditions of summer than at other times of year.

Water used during construction is anticipated to come from wells on-site or from nearby municipalities with existing water rights. The Applicant will also detail water amounts for construction of the Facility in the ASC.

During operations, the Applicant anticipates water to be obtained from on-site wells in amounts exempted under ORS 537.545 or from nearby municipalities with existing water rights. Generally, water during operation will be used for washing solar panels and Facility vehicles, and within the O&M building. The average amount of water used for the Facility will be less than 5,000 gallons per day during operations and therefore, will not require a new water right.

Therefore, public water systems will not be adversely affected by construction or operation of the Facility.

Stormwater Drainage

Due to the rural nature of the proposed Facility, there is minimal existing stormwater infrastructure in the area except for existing drainage ditches alongside public roads. Thus, the proposed Facility will not have significant adverse impacts on stormwater drainage services or infrastructure. Stormwater from access roads and solar panels is expected to be minimal and will flow to the adjacent ground and infiltrate on-site.

For construction, the Applicant will obtain a NPDES 1200-C Permit and will handle stormwater according to the terms of the permit and accompanying Erosion and Sediment Control Plan. Construction stormwater will be handled in accordance with the terms of the permit. During operation, stormwater runoff from the Facility will be managed on site, typically using retention and infiltration systems. These facilities will be located on private land and will not affect the provision of stormwater management services by any public agency. There are no incorporated communities located within the Facility site boundary. Thus, the Facility will have no impact on stormwater drainage services provided in more urban communities in the area.

Solid Waste Management

The Dalles Disposal and Waste Connections provide solid waste management and recycling services to Sherman County through a franchise agreement (County 2024b). Solid waste generated at the Facility will be non-hazardous and generated through construction-related activities. Waste materials generated through the construction of the solar array, BESS, and associated infrastructure will consist of scrap metal, concrete waste, and packaging materials. Disposal of this waste will be privately contracted with commercial haulers. The Dalles Disposal/Waste Connections collects non-hazardous solid waste including trash, cardboard, organics, recycling, construction, and demolition debris. Waste that cannot be recycled or sold for reuse will be disposed of at a collection facility operated by the Tri-County Hazardous Waste & Recycling Program and located in The Dalles.

The O&M building will generate small quantities of solid waste during operation of the Facility. Typical waste will include plastic, paper, and food. Replacement of equipment throughout the lifetime of the Facility will produce scrap metal, solar panels, inverters. Waste that is not recyclable will be disposed of at the collection facility operated by the Tri-County Hazardous Waste & Recycling Program. The Applicant will contract with a recycling company and/or a specific hazardous waste disposal firm for periodic disposal of lithium batteries from the BESS.

Housing

Construction

The Applicant anticipates an average of 300 employees will be present on-site during construction. This number will fluctuate during periods where multiple teams of contractors perform their work simultaneously. The Applicant estimates that a maximum of 600 employees will be on-site at one time, during periods of the highest activity.

The construction workforce will include a wide variety of specialized workers for certain construction tasks. Construction workers hired from outside the local area will need temporary housing. The amount of temporary housing needed will depend on the percentage of workers hired from outside of the local area. The percentage of the construction workforce hired locally will depend on the availability of workers with appropriate skills. This percentage is continually growing due to the number of solar energy projects that are being built in eastern Oregon. For construction workers hired nonlocally, there are several options for temporary housing within a commutable distance to the site, such as The Dalles, Hood River, and Madras. Since a portion of the temporary workers will be hired locally, the Applicant does not anticipate a significant impact on housing within the 10-mile analysis area. Due to the number of regional communities that workers can choose from for housing, their impact to housing in the immediate vicinity of the Facility is anticipated to be reduced. Workers from outside the area will benefit local businesses with their patronage for housing, food, or other daily needs. The Applicant is also considering options for incorporating temporary workforce housing and will describe these in more detail in the ASC.

Operation

It is estimated that fewer than 20 full-time employees will work on-site for the 35-year lifetime of the Facility. Preference will be given to local candidates, but some outside contractors who specialize in maintenance tasks may need to be hired. The Applicant does not anticipate significant impacts to housing in the surrounding community as a result of Facility operation.

Traffic Safety

Primary transportation corridors for the Facility include I-84, US-97, and Sherman County local roads. Heavy-duty and light-duty delivery vehicles and workforce traffic will utilize these routes

during construction. Generally, heavy-duty trucks will transport gravel, concrete, water, solar modules, steel, and larger materials. Light-duty trucks will carry people and electrical equipment. During construction of the Facility, traffic through the identified transportation corridors may increase due to the number of trucks and workers needed. The Applicant will enter into a road use agreement with Sherman County, as needed, to ensure public roads utilized during construction are left in as good or better condition than prior to construction. Additionally, the Applicant will develop a traffic management plan in coordination with Sherman County to minimize traffic safety impacts.

During operation, the Applicant does not anticipate the Facility will affect transportation corridors in Sherman County. It is estimated that fewer than 20 full-time employees will work on-site. Preference will be given to hiring local candidates, but some outside contractors who specialize in maintenance tasks may need to be hired. Delivery trucks may also access the Facility during operation on an infrequent basis. Due to the small number of permanent employees, there will not be significant increases to traffic in the surrounding areas. A detailed analysis of traffic generation resulting from both construction and operation of the Facility will be included in the ASC.

Police and Fire Protection

In Sherman County, the Oregon State Police Department and Sherman County Sheriff's Office provide police services (County 2024c). During construction, the Applicant will provide on-site security, and effective communications will be established between on-site security personnel and the Sherman County Sheriff's Office. The Applicant does not anticipate that the Facility will generate a significant long-term increase in demand for police services, as there are a relatively small number of new permanent residents anticipated to enter the area during operations.

The Facility is located within the South Sherman RFPD coverage area (OOSFM 2024). Prior to construction, the Applicant will work with the South Sherman RFPD and other relevant fire protection agencies to address potential needs for a fire prevention and management plan during construction. The Applicant will also develop first aid and emergency response procedures for the construction and operation of the Facility. Development of these plans will involve consultation with local emergency response agencies. The Applicant will notify the relevant fire protection agencies of construction plans and identify the location of and access to Facility components. The Facility will be equipped with fire protection equipment in accordance with the Oregon Fire Code. Fire danger during construction will be reduced through implementation of safe working practices, such as maintaining adequate fire-fighting equipment and water supplies on hand during operations that carry a high fire risk, conducting welding within a cleared or graveled area, preventing parking of vehicles in areas with high, dry grass, and through implementation of a Wildfire Mitigation Plan, if applicable. Fire danger during the operational phase of the Facility will be minimal. Therefore, significant new demands on the fire protection forces that serve the area are not anticipated.

Health Care

Due to the lower population density in the area where the Facility is located, hospital and medical centers are regional. The nearest hospitals are Adventist Health Columbia Gorge in The Dalles (approximately 24 miles northwest of the Facility) and St. Charles in Madras (approximately 52 miles southwest of the Facility). Both hospitals provide emergency and surgical services (St. Charles 2024; Adventist 2024).

The Sherman County Ambulance Service Area Plan (SCASAP) indicates that Sherman County has one Ambulance Service Area serviced by Sherman County Ambulance (County 2024d). The local ambulance services are provided by on-call licensed EMTs who provide basic and intermediate life support services. This service would also transport patients to the closest hospital in the event of an emergency.

Impacts to health care services could occur if Facility construction activities or increases in temporary or permanent residents were to increase the use of health care services exceeding the capacity of local providers. Impacts on local health care services will be minimized by careful management of site health and safety risks. The small number of new temporary and permanent residents is not expected to place significant new demands on the health care services in the area.

Schools

Sherman County School (a grade school, junior/senior high school, and athletic complex) and Sherman Preschool service all of Sherman County (County 2024e). The student population may increase slightly during construction of the Facility, depending on the number of non-locally hired employees; however, the Applicant does not expect permanent student increases from construction of the Facility. Operation of the Facility will require fewer than 20 permanent employees. Some employees may be hired locally, and others may relocate from outside the region with their families. Conservatively estimating that all 20 employees are hired from outside the region, all settle near the Facility rather than commuting from larger nearby communities, and on average, each brings two school-age children, up to approximately 40 children could enroll at area schools. Because children would be different ages, the number of children at any one grade level will be very low. Therefore, construction and operation of the Facility are not anticipated to have a significant or negative impact on the school system in Sherman County.

Exhibit L. Protected Areas – OAR 345-020-0011(1)(I)

(L) Exhibit L. A list of all protected areas in the study area for impacts to protected areas identifying:

(A) The distance and direction of the protected area from the proposed facility;

(B) The basis for protection of the area, by reference to a specific subsection of OAR 345-001-0010(26); and

(C) The name, mailing address, phone number, and email address of the land management agency or organization with jurisdiction over the protected area;

Response:

The protected areas study area is the Facility site boundary plus a surrounding 20-mile buffer (Figure 6), in accordance with OAR 345-001-0010(35)(e). Protected areas are defined and listed in OAR 345-001-0010(26). Table L-1 lists known protected areas within the study area, which are shown on Figure 6. Exhibit L of the ASC will include more detailed analysis of the potential impacts to protected areas.

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Table L-1. Protected Areas Inventory

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
National Park or other unit of the National Park System OAR 345-001-0010(26)(a)	Oregon National Historic Trail	12.3	North (and West)	National Trails Office - Regions 6, 7, 8 Oregon National Historic Trail 1100 Old Santa Fe Trail Santa Fe, NM 87505	Confirmed via USGS Gap Analysis Project (USGS GAP 2024)
	Lewis and Clark National Historic Trail	17	North		Confirmed via USGS Gap Analysis Project (USGS GAP 2024)
National Monument OAR 345-001-0010(26)(b)	None	N/A	N/A	N/A	Confirmed none via USGS Gap Analysis Project (USGS GAP 2024)
Wilderness Area OAR 345-001-0010(26)(c)	None	N/A	N/A	N/A	Confirmed none via USGS Gap Analysis Project (USGS GAP 2024)
Wild, Scenic, or Recreational River included in the National Wild and Scenic River System OAR 345-001-0010(26)(d)	White Wild and Scenic River	16.1	Southwest	BLM - Prineville District Office 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Confirmed via USGS Gap Analysis Project (USGS GAP 2024)
	Deschutes Wild and Scenic River	4.8	West		
	John Day Wild and Scenic River	5.2	East		
National Wildlife Refuge included in the National Wildlife Refuge System OAR 345-001-0010(26)(e)	None	N/A	N/A	N/A	Confirmed none via USGS Gap Analysis Project (USGS GAP 2024)
National Fish Hatcheries OAR 345-001-0010(26)(f)	None	N/A	N/A	N/A	Confirmed none via U.S. Fish and Wildlife Service – Visit National Fish Hatcheries (USFWS 2024).
National Recreation area, National Scenic area, or Special Resources Management Unit OAR 345-001-0010(26)(g)	Columbia River Gorge National Scenic Area	15.5	Northwest	USFS Forest Service Region 06: Pacific Northwest Region 1220 SW 3rd Avenue Portland, Oregon 97204	Confirmed via USGS Gap Analysis Project (USGS GAP 2024)
Wilderness Study Area OAR 345-001-0010(26)(h)	Lower John Day Wilderness Study Area	3.2	East	BLM - Prineville District Office 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Confirmed via USGS Gap Analysis Project (USGS GAP 2024)
	North Pole Ridge Wilderness Study Area	15	Southeast		
	Thirtymile Wilderness Study Area	8.9	Southeast		
Land designated in a federal land management plan or by an act of Congress as (includes Areas of Critical Environmental Concern, Outstanding Natural Areas, Research Natural Areas, Experimental Forests or Ranges, and Special Interest Areas)					
Area of Critical Environmental Concern OAR 345-001-0010(26)(i)(A)	Armstrong Canyon	15.4	Southeast	BLM - Prineville District Office 3050 NE 3rd Street	Confirmed via USGS Gap Analysis Project (USGS GAP 2024)

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
	Ferry Canyon	7.3	East	Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	
Outstanding Natural Area OAR 345-001-0010(26)(i)(B)	None	N/A	N/A	N/A	Confirmed none via USGS Gap Analysis Project (USGS GAP 2024)
Research Natural Area OAR 345-001-0010(26)(i)(C)	None	N/A	N/A	N/A	Confirmed none via USGS Gap Analysis Project (USGS GAP 2024)
Experimental Forest or Range OAR 345-001-0010(26)(i)(D)	None	N/A	N/A	N/A	Confirmed none via USGS Gap Analysis Project (USGS GAP 2024)
Special Interest Area designated for scenic, geologic, botanic, zoologic, paleontological, archaeological, historic, or recreational values, or combinations of these values OAR 345-001-0010(26)(i)(E)	None	N/A	N/A	N/A	Confirmed none via USGS Gap Analysis Project (USGS GAP 2024)
State park, wayside, corridor, monument, historic, or recreation area under the jurisdiction of the Oregon Parks and Recreation Department OAR 345-001-0010(26)(j)	Deschutes-Oregon Wildlife Heritage Foundation #1	6.5	Northwest	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (800) 551-6949 park.info@oregon.gov	Confirmed via Oregon Parks and Recreation Department State Parks database (OPRD 2014).
	Deschutes-Oregon Wildlife Heritage Foundation #2	6.5	Northwest		
	Deschutes River State Recreation Area	7	Northwest		
	J.S. Burres State Park	10	Northeast		
	Cottonwood Canyon State Park	8.5	Northeast		
	John Day (Hilderbrand) State Park	16	Northeast		
	White River Falls State Park	16.6	Southwest		
Willamette River Greenway OAR 345-001-0010(26)(k)	None	N/A	N/A	N/A	Confirmed none via Oregon Parks and Recreation Department State Parks database (OPRD 2014).

Protected Areas within 20 Miles of Facility Site Boundary		Distance to Facility Site Boundary (miles)	Direction from Facility	Agency Contact Information	Data Source
Type	Area Name				
Natural area listed in the Oregon Register of Natural Areas OAR 345-001-0010(26)(l)	Tygh Valley State Natural Area	5.5	Southwest	NR-Corvallis (headquarters) Oregon State University 234 Strand Hall 170 SW Waldo Place Corvallis, OR 97331-8680 (541) 737-9918 inr@oregonstate.edu	Confirmed via Institute of Natural Resources (INR 2020).
South Slough National Estuarine Research Reserve OAR 345-001-0010(26)(m)	None	N/A	N/A	N/A	Confirmed none via Institute of Natural Resources (INR 2020).
State Scenic Waterway OAR 345-001-0010(26)(n)	Deschutes River State Scenic Waterway	5.2	West	Oregon Parks and Recreation Department 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0707 park.info@oregon.gov	Confirmed via USGS Gap Analysis Project (USGS GAP 2024) and Oregon Parks and Recreation Department State Parks database (OPRD 2014).
State Wildlife Refuge or Management Area OAR 345-001-0010(26)(o)	Lower Deschutes (River Tract)	7.3	Northwest	ODFW 4034 Fairview Industrial Drive SE Salem, OR 97302 (503) 947-6000 https://myodfw.com/white-riverwildlife-area-visitors-guide	Confirmed via Oregon Department of Fish and Wildlife, Wildlife Areas Data Clearinghouse (ODFW 2021).
	Lower Deschutes (Woolsey Tract)	5.6	West		
	Lower Deschutes	4.9	Northwest		
	Rufus Pond	17.4	Northwest		
Fish hatchery operated by the Oregon Department of Fish and Wildlife OAR 345-001-0010(26)(p)	Oak Springs Hatchery	17.5	Southwest	Oak Springs	Confirmed via Oregon Department of Fish and Wildlife - Natural Resources Information Management Program - Hatchery Data (ODFW 2014).
Agricultural experiment station, experimental area, or research center established by Oregon State University OAR 345-001-0010(26)(q)	Oregon State University Sherman County Extension	3.5	North	Oregon State University (OSU) College of Agricultural Sciences 430 Strand Ag Hall Corvallis, OR 97331 (541) 737-2331	Confirmed via OSU website and .pdf maps (OSU 2024a)
Research forest established by Oregon State University OAR 345-001-0010(26)(r)	None	N/A	N/A	N/A	Confirmed none using OSU website and .pdf maps (SU 2024b)

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Exhibit M. Water Sources and Use – OAR 345-020-0011(1)(m)

(m) Exhibit M. Information about anticipated water use during construction and operation of the proposed facility, including:

(A) A description of each source of water and the applicant's estimate of the amount of water the facility will need from each source.

Response:

Information regarding the anticipated water use during construction and operation of the proposed Facility is described below.

Construction

Approximately 250 million gallons of water will be required over the course of construction, mostly for access road and earthwork compaction and dust suppression. Actual daily water use will vary depending on weather and the final construction schedule. For example, water usage for dust control will be greater during the dry, windy conditions of summer than at other times of year.

Water used during construction is anticipated to come from wells on-site or from nearby municipalities with existing water rights. The Applicant will also detail water amounts for construction of the Facility in the ASC.

Operation

During operations, the Applicant anticipates water to be obtained from on-site wells in amounts exempted under ORS 537.545 or from nearby municipalities with existing water rights. Generally, water during operation will be used for washing solar panels and Facility vehicles, and within the O&M building. The average amount of water used for the Facility will be less than 5,000 gallons per day during operations and therefore, will not require a new water right.

(B) If a new water right is required, the approximate location of the points of diversion and the estimated quantity of water to be taken at each point; and

Response:

At the present time, the Applicant does not anticipate that the Facility will require new water rights.

(C) For operation, the source of cooling water and the estimated consumptive use of cooling water, based on annual average conditions.

Response:

The Facility is a solar photovoltaic power generation facility and no cooling water is required for operation.

Exhibit N. Carbon Dioxide Emissions – OAR 345-020-0011(1)(n)

(n) Exhibit N. If the proposed facility would emit carbon dioxide, an estimate of the gross carbon dioxide emissions that are reasonably likely to result from the operation of the facility and a statement of the means by which the applicant intends to comply with the applicable carbon dioxide emissions standard under OAR 345-024-500.

Response:

The Facility will not emit carbon dioxide. Therefore, these rules are not applicable.

Exhibit O. Evaluation of Statutes, Rules, and Ordinances – OAR 345-020- 0011(1)(o)

(o) Exhibit O. Identification, by legal citation, of all state statutes and administrative rules and local government ordinances containing standards or criteria that the proposed facility must meet for the Council to issue a site certificate, other than statutes, rules and ordinances identified in Exhibit E, and identification of the agencies administering those statutes, administrative rules and ordinances. The applicant must analyze and describe any problems the applicant foresees in satisfying the requirements of any such statute, rule or ordinance.

Response:

The applicable state statutes, administrative rules and ordinances are listed below in Table O-1. These statutes, rules, and local ordinances contain standards or criteria that must be met by the Applicant for EFSC to issue a site certificate beyond what is listed in Exhibit E. The Applicant does not anticipate problems in meeting specific requirements.

Table O-1. Statutes, Rules, and Ordinances Containing Relevant Standards or Criteria

Department	Legal Citation	Agency Address
Sherman County Planning Department	Sherman County Zoning Ordinance; Sherman County Comprehensive Plan	Sherman County Planning Department 66365 Lonerock Road Moro, OR 97039 (541) 565-3601
Oregon Department of Land Conservation and Development	Comprehensive Land Use Planning Coordination - ORS Chapter 197; Oregon Department of Land Conservation and Development Administrative Rules - OAR Chapter 660	Department of Land Conservation and Development 635 Capitol Street NE, Suite 150 Salem, OR 97301 (503) 373-0050
Oregon Office of State Fire Marshal	2019 Oregon Fire Code; OAR Chapter 837, Division 40	Oregon Office of State Fire Marshal 3991 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-3473
Oregon Office of State Fire Marshal— Emergency Planning and Community Right to Know Act	ORS 453; OAR Chapter 837, Divisions 85 and 95; Fire and Life Safety Regulations, OAR 837, Division 40	Oregon Office of State Fire Marshal 3991 Fairview Industrial Dr SE Salem, OR 97302 (503) 378-3473

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Department	Legal Citation	Agency Address
Oregon Parks and Recreation Department, State Historic Preservation Office —Archaeological	Native American Graves and Protected Objects—ORS 97.740-97.760 Archaeological Objects and Sites—ORS 358.90-358.955 Permit and Conditions for Excavation or Removal of Archaeological or Historical Materials on Private Lands (OAR 736-051-0090)	State Historic Preservation Office 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0690
Oregon Department of Geology and Mineral Industries	OAR Chapter 632, Division 1	Oregon Department of Geology and Mineral Industries 800 NE Oregon Street, Suite 965 Portland, OR 97232 (971) 673-1555
ODEQ—Solid Waste	ORS 459; OAR Chapter 340, Division 93	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 (541) 298-7255 ext. 221 (Eastern Region)
ODEQ—Hazardous Waste Management	ORS 465 and 466; OAR Chapter 340, Divisions 100-122	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696
ODEQ—Noise	ORS 467; OAR Chapter 340, Division 35	Oregon Department of Environmental Quality 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696
ODEQ—Water Quality & Stormwater Control	ORS 468 and 468B; OAR Chapter 340, Divisions 41, 45, and 55	Oregon Department of Environmental Quality 400 E. Scenic Drive, Suite 307 The Dalles, OR 97058 (541) 298-7255
Oregon Department of State Lands	OAR Chapter 141	Oregon Department of State Lands 1645 NE Forbes Rd., Suite 112 Bend, OR 97701 (541) 388-6112
Oregon Water Resources Department – Water Rights Division	ORS Chapters 537, 540; OAR Chapter 690	Oregon Water Resources Department Water Rights Section, District 3 2705 E 2nd Street The Dalles, OR 97058 (541) 506-2652

Notice of Intent to Apply for a Site Certificate

Department	Legal Citation	Agency Address
ODFW	ORS 496-497; OAR Chapter 635, Divisions 100 and 415	ODFW The Dalles Fish Screens and Field Office 3561 Klindt Dr The Dalles, OR 97058 (541) 296-8026
Oregon Department of Agriculture	Plant Conservation Biology Program— ORS 564.105; OAR Chapter 603, Division 73	Oregon Department of Agriculture 635 Capitol Street NE Salem, OR 97301 (503) 986-4550

Exhibit P. Schedule for Application for Site Certificate – OAR 345-020-0011(1)(p)

(p) Exhibit P. A schedule stating when the applicant expects to submit a preliminary application for a site certificate.

Response:

The Applicant intends to submit the NOI and Preliminary ASC according to the schedule shown in Table P-1.

Table P-1. Proposed Schedule for Application for Site Certificate Submittal

Activity	Anticipated Date
Applicant submits the NOI to ODOE	July 2024
EFSC reviews the NOI, distributes public notice, conducts public information meeting as needed, facilitates comment period, and issues Project Order	August – November 2024
Applicant submits Preliminary ASC to ODOE	December 2024

Exhibit Q. Evidence of Consultation with State Commission on Indian Services – OAR 345-020-0011(1)(q)

(q) Exhibit Q. Evidence of consultation with the Legislative Commission on Indian Services to identify each appropriate tribe to consult with regarding the proposed facility's possible effects on Indian historic and cultural resources.

Response:

The Applicant submitted an email to the Oregon Legislative Commission on Indian Services to identify appropriate Tribes to contact regarding possible effects of the Facility on Indian historic and cultural resources. On April 30, 2024, the Legislative Commission provided an email identifying the Burns Paiute Tribe, Confederated Tribes of the Umatilla Indian Reservation, and Confederated Tribes of the Warm Springs Reservation of Oregon as Tribal governments that should be notified (Attachment 3). The Applicant also used the U.S. Department of Housing and Urban Development's Tribal Directory Assessment Tool to identify two additional Tribal governments to be notified: the Nez Perce Tribe and the Confederated Tribes and Bands of the Yakama Nation.

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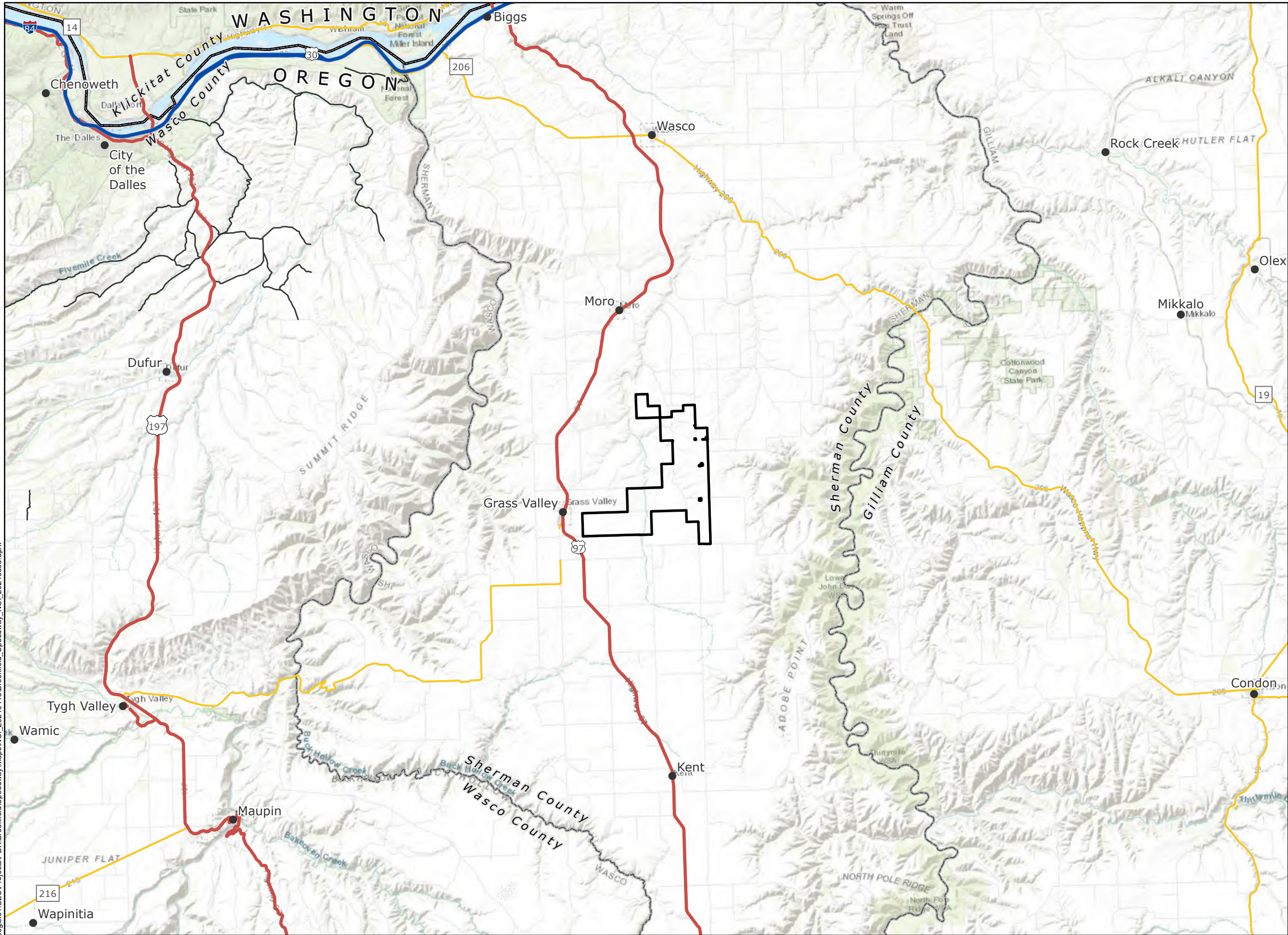
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Figures

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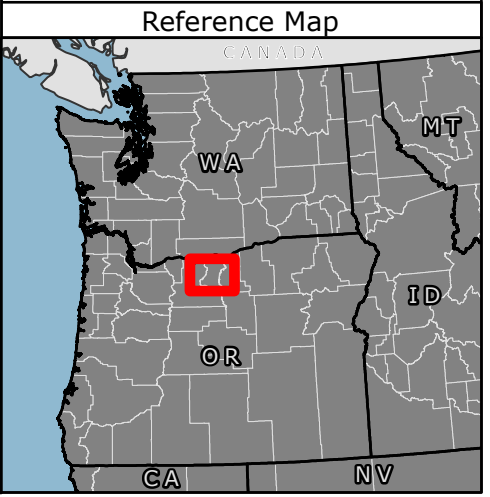


Speedway Solar Facility

Figure 1
Site Vicinity

SHERMAN COUNTY, OR

- Site Boundary
- City/Town
- County Boundary
- State Boundary
- Interstate Highway
- US Highway
- State Highway
- County Highway










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Speedway Solar Facility

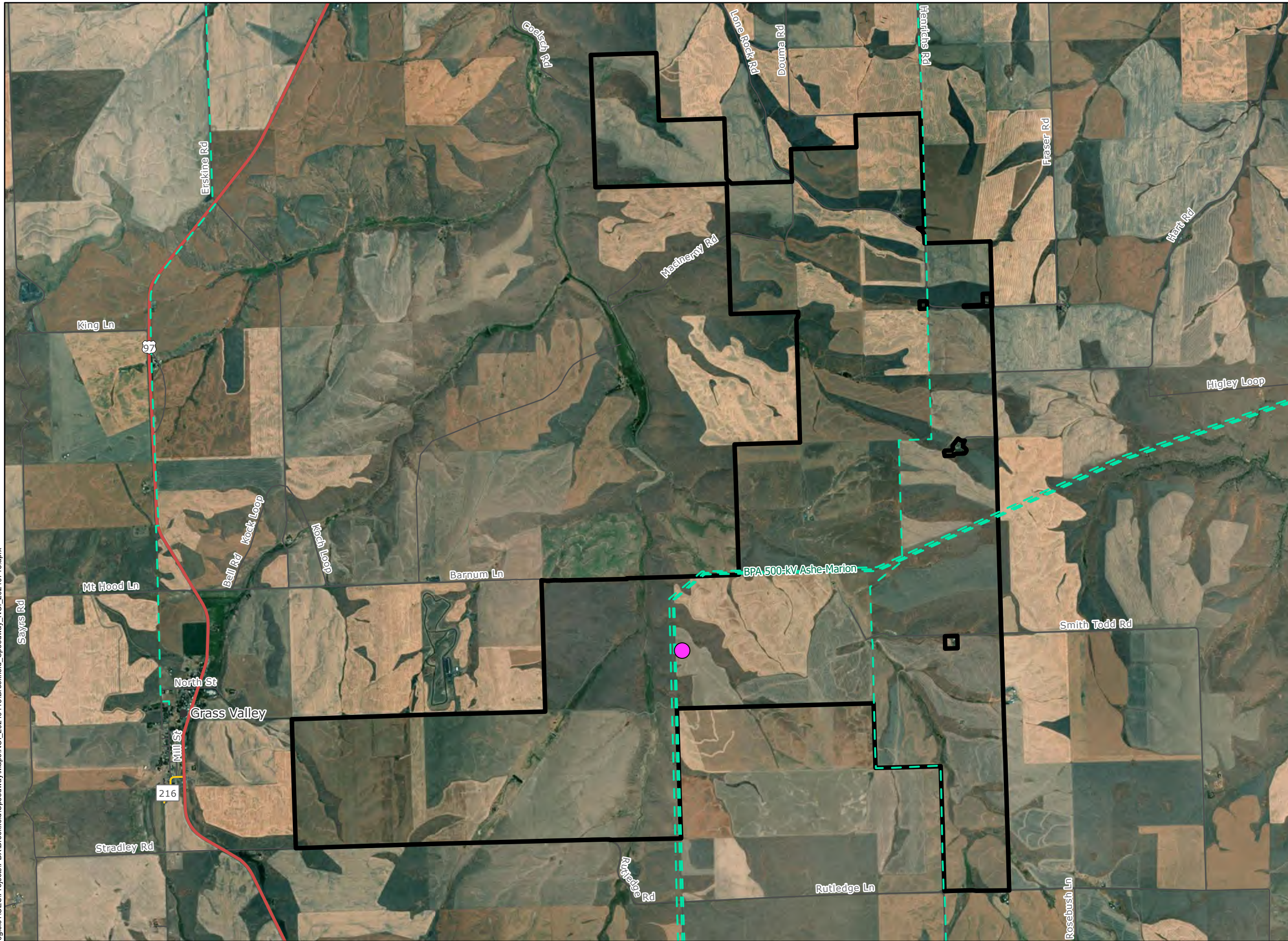
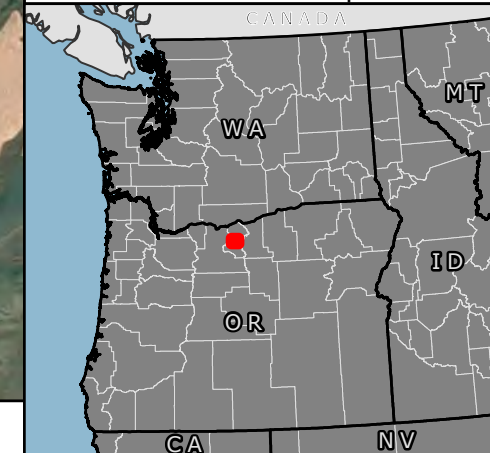
Figure 2 Facility Site Overview

SHERMAN COUNTY, OR

-  Site Boundary
-  Approximate Location for Point of Interconnection
-  City/Town
-  US Highway
-  State Highway
-  Local Roads
-  Existing Transmission Lines



Reference Map

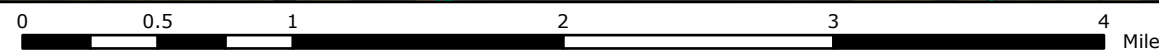


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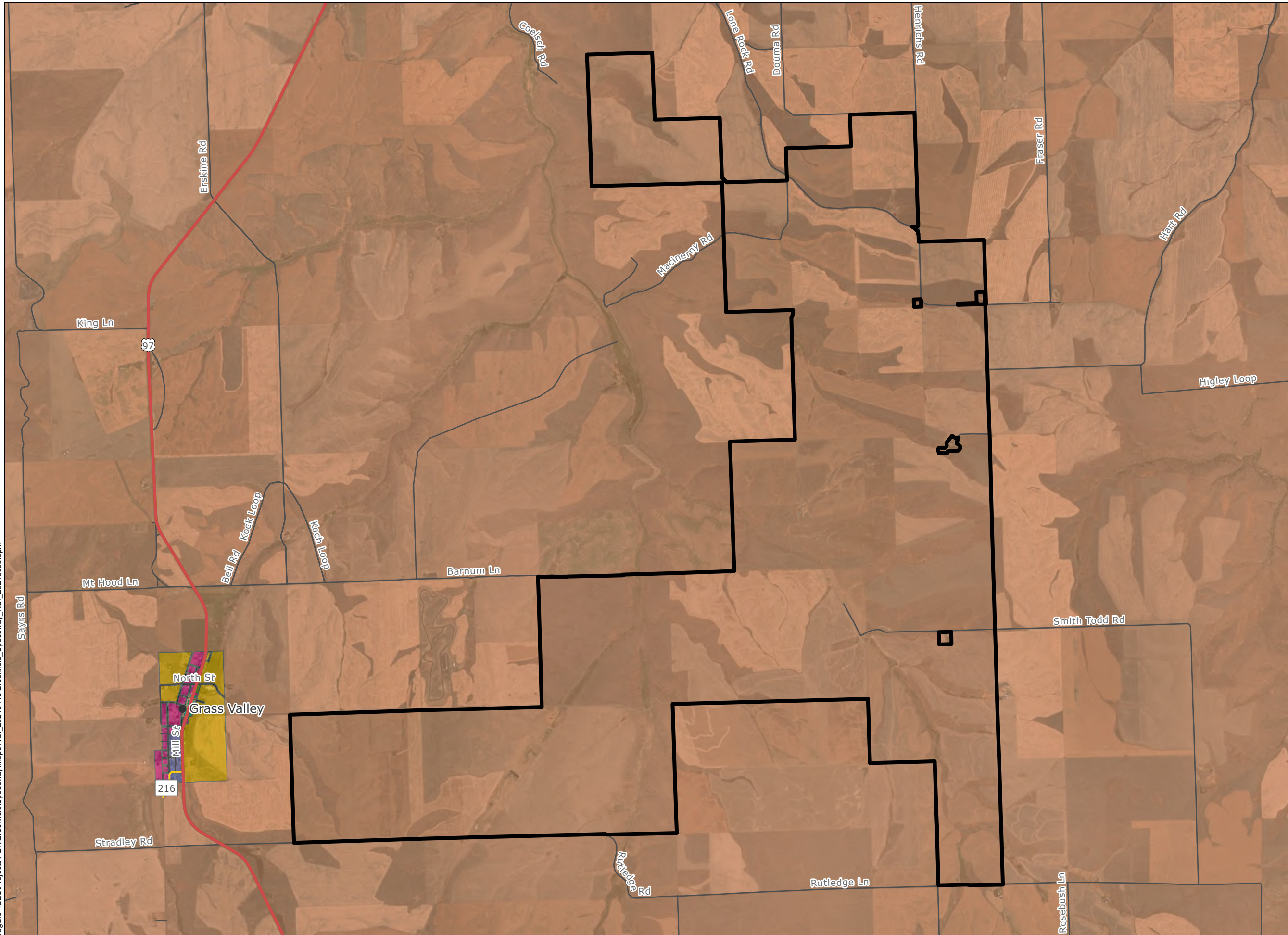
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Speedway Solar Facility

Figure 3 Zoning

SHERMAN COUNTY, OR

-  Site Boundary
-  City/Town
-  US Highway
-  State Highway
-  Local Roads
- Sherman County Zoning
 -  Exclusive Farm Use (F-1)
- City of Grass Valley Zoning
 -  Commercial - General
 -  Industrial - Light
 -  Medium Low-density Residential
 -  Very Low-density Residential
 -  Parks & Open Space

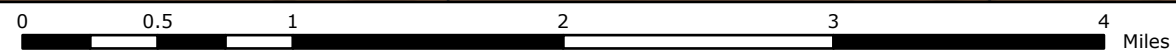


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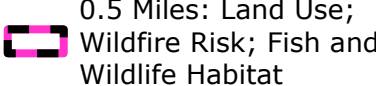
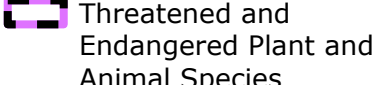
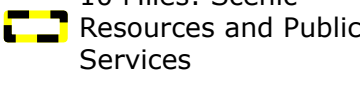


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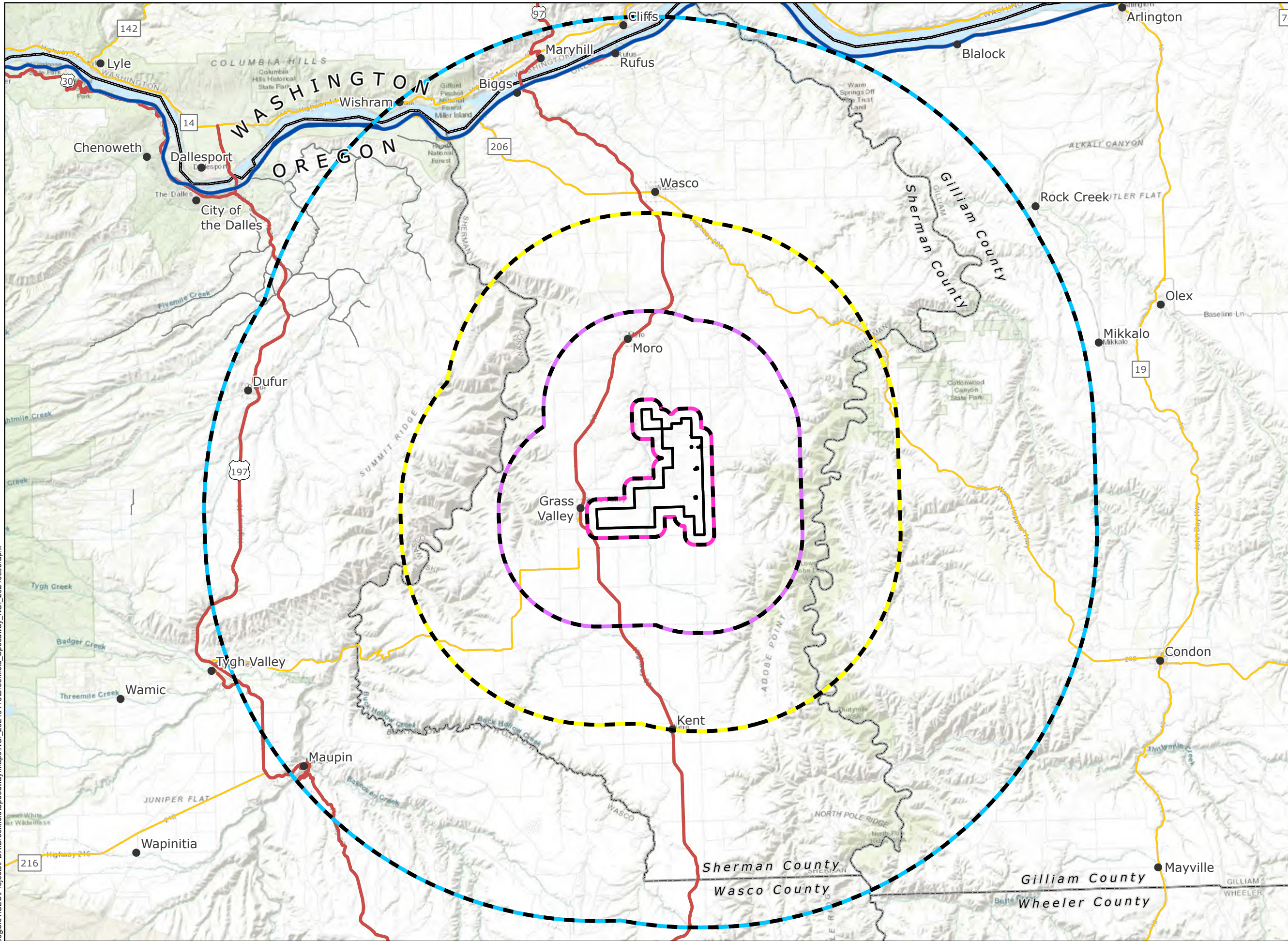
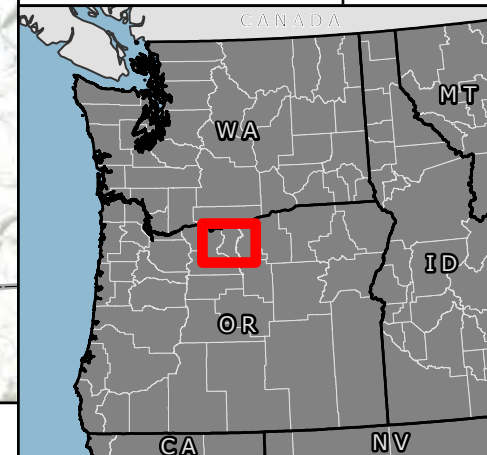
Figure 4 Study Area Boundaries

SHERMAN COUNTY, OR

-  Site Boundary
-  City/Town
-  County Boundary
-  State Boundary
-  Interstate Highway
-  US Highway
-  State Highway
- Study Areas
-  0.5 Miles: Land Use; Wildfire Risk; Fish and Wildlife Habitat
-  5 Miles: Recreational Opportunities; Threatened and Endangered Plant and Animal Species
-  10 Miles: Scenic Resources and Public Services
-  20 Miles: Protected Areas



Reference Map



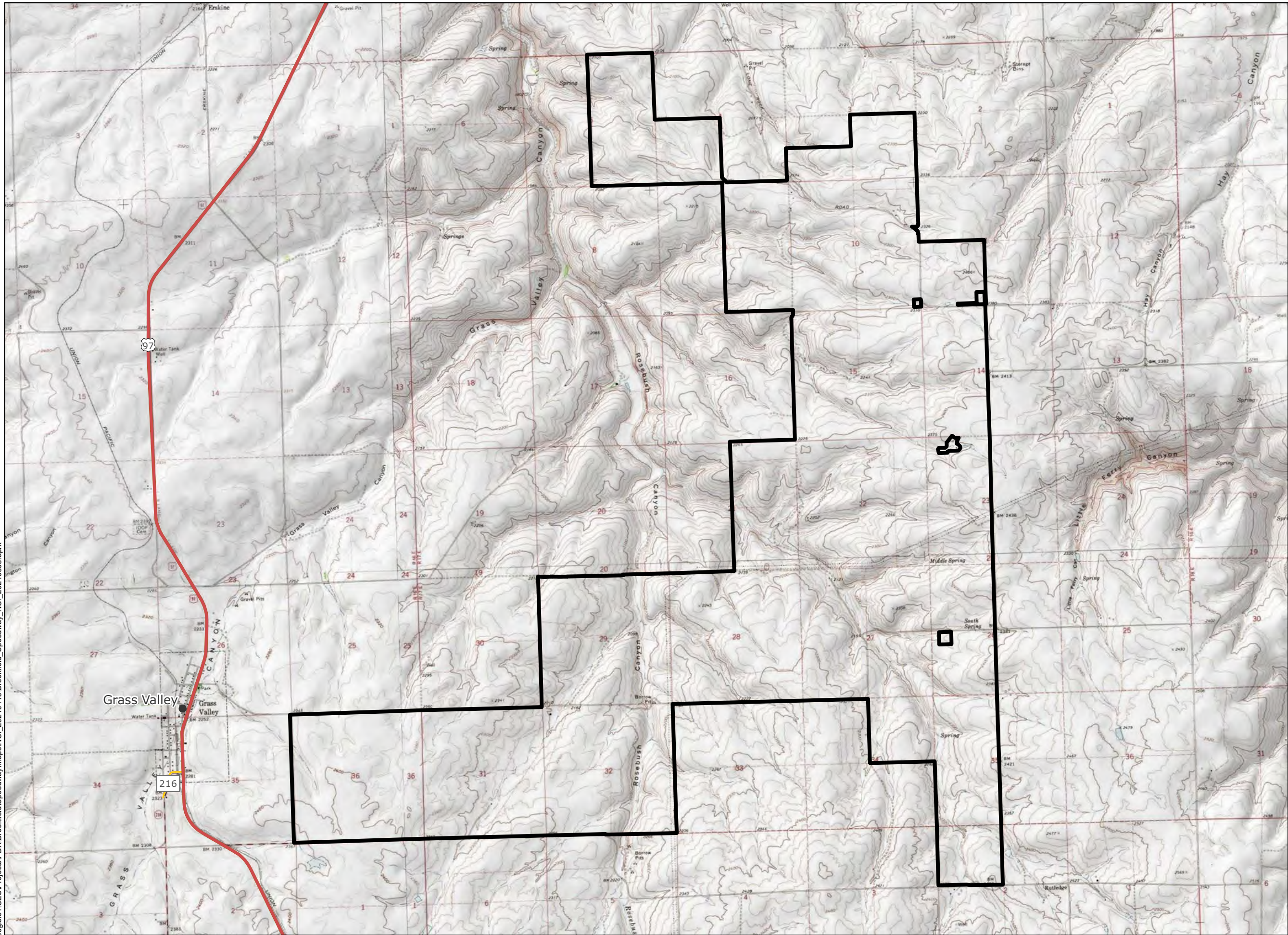
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Speedway Solar Facility

Figure 5 Topography

SHERMAN COUNTY, OR

-  Site Boundary
-  City/Town
-  US Highway
-  State Highway



Reference Map

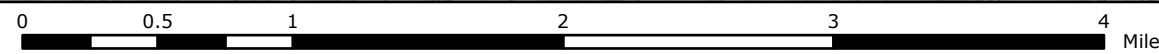


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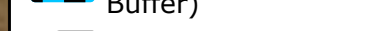
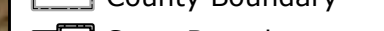


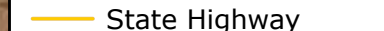


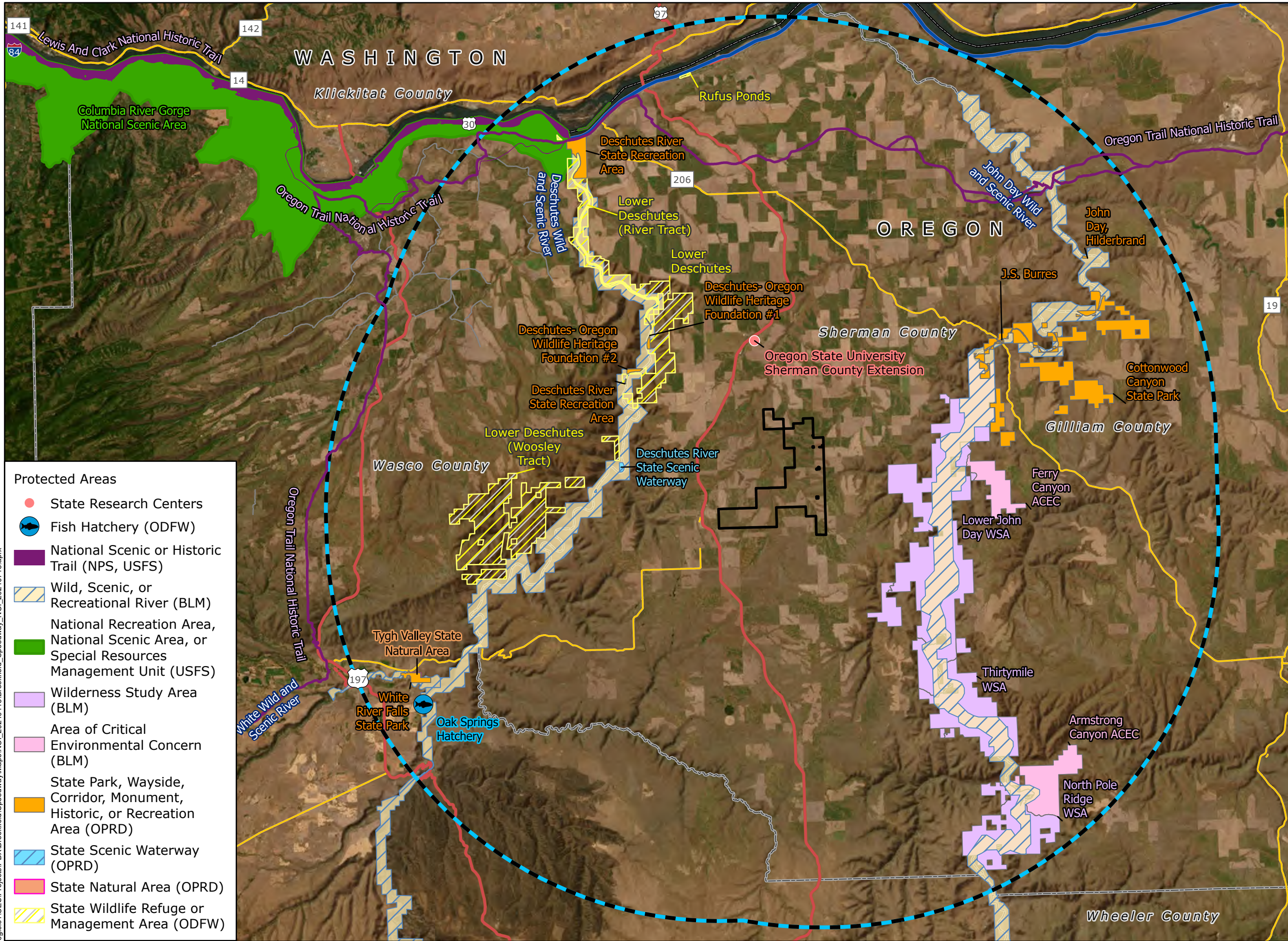
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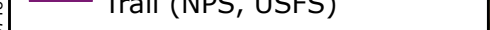
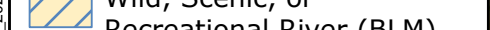




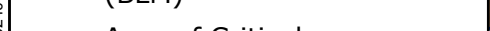

Speedway Solar Facility

Figure 6 Protected Areas

SHERMAN COUNTY, OR

-  Site Boundary
-  Study Area (20-mile Buffer)
-  County Boundary
-  State Boundary
-  Interstate Highway
-  US Highway
-  State Highway



- ### Protected Areas
-  State Research Centers
 -  Fish Hatchery (ODFW)
 -  National Scenic or Historic Trail (NPS, USFS)
 -  Wild, Scenic, or Recreational River (BLM)
 -  National Recreation Area, National Scenic Area, or Special Resources Management Unit (USFS)
 -  Wilderness Study Area (BLM)
 -  Area of Critical Environmental Concern (BLM)
 -  State Park, Wayside, Corridor, Monument, Historic, or Recreation Area (OPRD)
 -  State Scenic Waterway (OPRD)
 -  State Natural Area (OPRD)
 -  State Wildlife Refuge or Management Area (ODFW)

















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Speedway Solar Facility

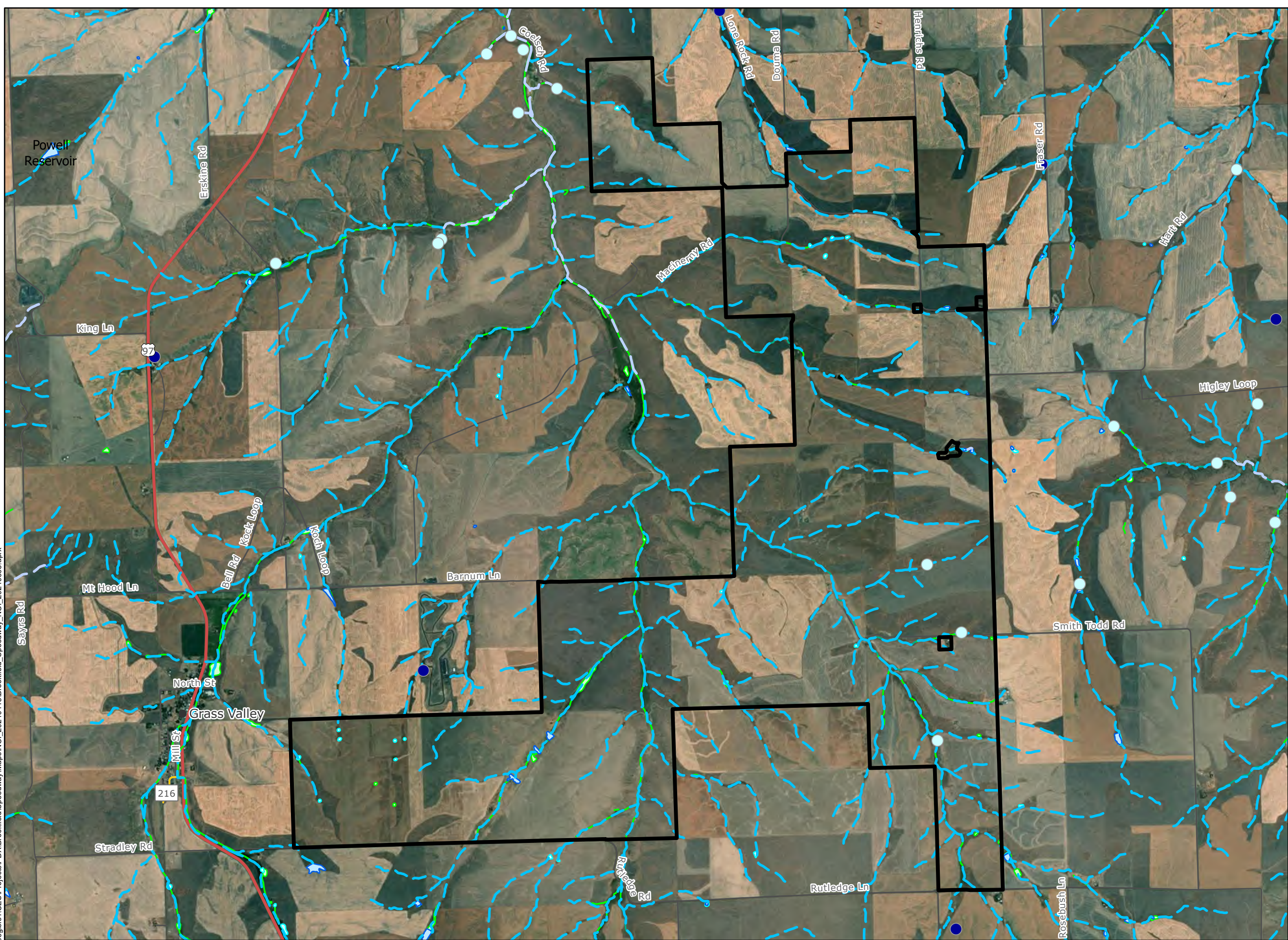
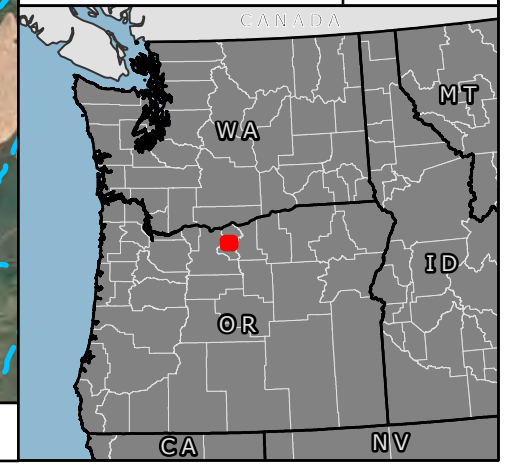
**Figure 7
National Wetlands
Inventory and National
Hydrography Dataset**

SHERMAN COUNTY, OR

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



Reference Map

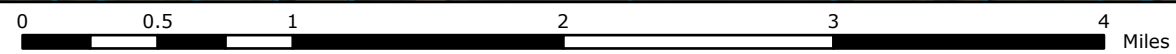


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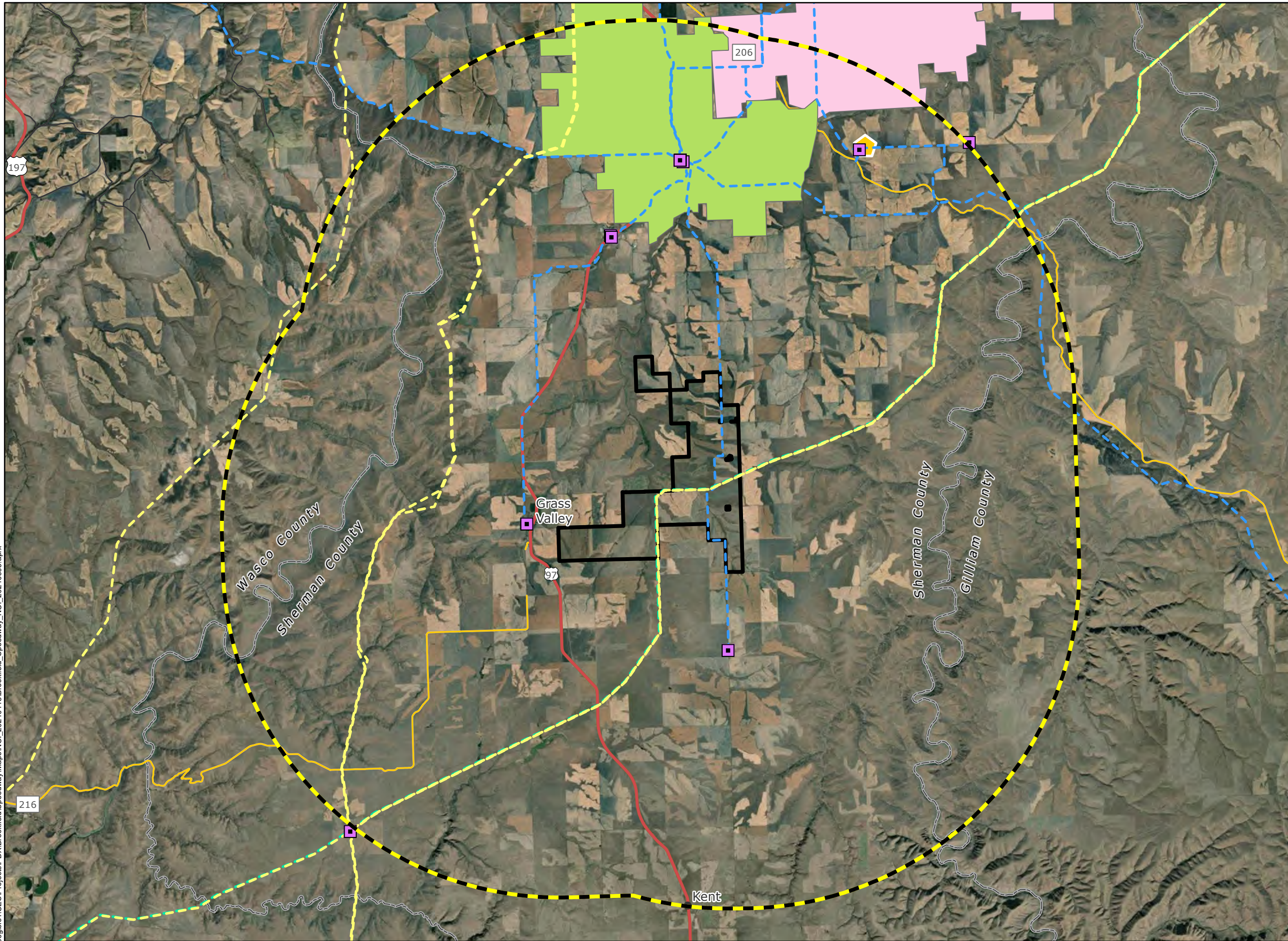
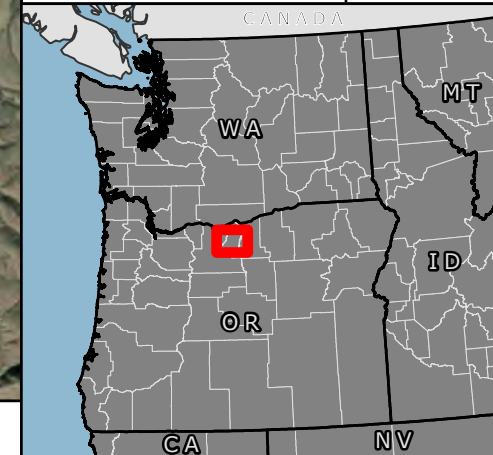
Figure 8 Energy Facilities

SHERMAN COUNTY, OR

- Site Boundary
- Study Area (10-mile Buffer)
- Energy Facilities
 - Hay Canyon Wind Power LLC
 - Golden Hills Wind Project
 - Klondike III Wind Project
- Existing Energy Infrastructure
 - Substations
 - 69-115 kV Transmission Line
 - 230-345 kV Transmission Line
 - 500 kV Transmission Line
 - City/Town
 - County Boundary
 - US Highway
 - State Highway
 - County Highway



Reference Map

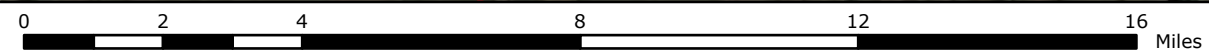


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Attachment 1. Articles of Organization

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APPLICATION FOR AUTHORITY

Attachment 1.



Corporation Division
sos.oregon.gov/business

E-FILED
Jun 24, 2024

OREGON SECRETARY OF STATE

REGISTRY NUMBER

227975893

TYPE

FOREIGN LIMITED LIABILITY COMPANY

1. ENTITY NAME

BROOKFIELD SPEEDWAY SOLAR HOLDINGS LLC

2. MAILING ADDRESS

200 LIBERTY ST FL 14
NEW YORK NY 10281 USA

3. NAME & ADDRESS OF REGISTERED AGENT

15872088 - CORPORATION SERVICE COMPANY

1127 BROADWAY ST NE SUITE 310
SALEM OR 97301 USA

4. MANAGEMENT

This Limited Liability Company will be manager-managed by one or more managers

5. DATE OF ORGANIZATION

06-10-2024

6. DURATION

PERPETUAL

7. JURISDICTION

DE

8. PRIMARY PHYSICAL LOCATION

200 LIBERTY ST FL 14
NEW YORK NY 10281 USA



Corporation Division
sos.oregon.gov/business

OREGON SECRETARY OF STATE

I declare, under penalty of perjury, that this document does not fraudulently conceal, fraudulently obscure, fraudulently alter or otherwise misrepresent the identity of the person or any officers, managers, members or agents of the limited liability company on behalf of which the person signs. This filing has been examined by me and is, to the best of my knowledge and belief, true, correct, and complete. Making false statements in this document is against the law and may be penalized by fines, imprisonment, or both.

By typing my name in the electronic signature field, I am agreeing to conduct business electronically with the State of Oregon. I understand that transactions and/or signatures in records may not be denied legal effect solely because they are conducted, executed, or prepared in electronic form and that if a law requires a record or signature to be in writing, an electronic record or signature satisfies that requirement.

ELECTRONIC SIGNATURE

NAME

ANDREA FRADIQUE

TITLE

VP & ASSIST. SECRETARY

DATE

06-21-2024

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "BROOKFIELD SPEEDWAY SOLAR HOLDINGS LLC", FILED IN THIS OFFICE ON THE TENTH DAY OF JUNE, A.D. 2024, AT 9:55 O`CLOCK A.M.




Jeffrey W. Bullock, Secretary of State

3882722 8100
SR# 20242818487

Authentication: 203695369
Date: 06-12-24

You may verify this certificate online at corp.delaware.gov/authver.shtml

STATE OF DELAWARE
CERTIFICATE OF FORMATION
OF LIMITED LIABILITY COMPANY

The undersigned authorized person, desiring to form a limited liability company pursuant to the Limited Liability Company Act of the State of Delaware, hereby certifies as follows:

1. The name of the limited liability company is Brookfield Speedway Solar Holdings LLC.

2. The Registered Office of the limited liability company in the State of Delaware is located at 251 Little Falls Drive (street), in the City of Wilmington, Zip Code 19808. The name of the Registered Agent at such address upon whom process against this limited liability company may be served is Corporation Service Company.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation this 10th day of June, 2024.

By: N. Godard
Authorized Person

Name: Nathalie Godard
Print or Type

Attachment 2. Tax Lots and Property Owner Information








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Map Tax Lot	Owner	Mail Address	Mail City	State	Zip Code	Full Mailing Address
01S17E00007900	COELSCH, LEO W	63711 COELSCH ROAD	MORO	OR	97039	63711 COELSCH ROAD MORO, OR 97039
01S17E00008000	COELSCH, LEO W	63711 COELSCH ROAD	MORO	OR	97039	63711 COELSCH ROAD MORO, OR 97039
01S17E00008100	MILLER, MERLE ALLEN JR.	3225 ASH STREET	BAKER CITY	OR	97814	3225 ASH STREET BAKER CITY, OR 97814
02S16E00003400	BIRD FAMILY TRUST	PO BOX 156	WASCO	OR	97065	PO BOX 156 WASCO, OR 97065
02S16E00005000	CHAFFIN, MARGARET RUTH ETAL	18714 S SPRINGWATER RD	ESTACADA	OR	97023	18714 S SPRINGWATER RD ESTACADA, OR 97023
02S16E00005100	ROLFE LAND & CATTLE CO LLC	96000 ROSEBUSH LN	GRASS VALLEY	OR	97029	96000 ROSEBUSH LN GRASS VALLEY, OR 97029
02S16E2600200	ROLFE, FRED M & NANCY	PO BOX 144	GRASS VALLEY	OR	97029-0144	PO BOX 144 GRASS VALLEY, OR 97029-0144
02S17E00001000	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	PO BOX 440 WASCO, OR 97065
02S17E00001100	COELSCH, LEO W	63711 COELSCH ROAD	MORO	OR	97039	63711 COELSCH ROAD MORO, OR 97039
02S17E00001101	COELSCH, LEO W & KRISTA	63711 COELSCH ROAD	MORO	OR	97039	63711 COELSCH ROAD MORO, OR 97039
02S17E00001500	MCKAY, ALEXIS	4248 GALEWOOD ST	LAKE OSWEGO	OR	97035	4248 GALEWOOD ST LAKE OSWEGO, OR 97035
02S17E00001600	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	PO BOX 440 WASCO, OR 97065
02S17E00001700	POWELL, PATRICK, TRUSTEE	PO BOX 440	WASCO	OR	97065	PO BOX 440 WASCO, OR 97065
02S17E00001800	BLAIR, PHILIP J & NETTIE L	35939 ABBIE LANE	ASTORIA	OR	97103	35939 ABBIE LANE ASTORIA, OR 97103
02S17E00001900	BLACKBURN, GARY L ETAL	25940 S JEWELL ROAD	BEAVERCREEK	OR	97004	25940 S JEWELL ROAD BEAVERCREEK, OR 97004
02S17E00002600	HART, DARRYL R	63461 FRASER ROAD	MORO	OR	97039	63461 FRASER ROAD MORO, OR 97039
02S17E00002700	PINKERTON RANCH	PO BOX 343	MORO	OR	97039	PO BOX 343 MORO, OR 97039
02S17E00002701	DEGRANGE, MICHAEL & AMBER	405 SW 5TH ST	DES MOINES	IA	50328	* IN CARE OF: WELLS FARGO REAL ESTATE TAX, 405 SW 5TH ST DES MOINES, IA 50328
02S17E00002800	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	PO BOX 440 WASCO, OR 97065
02S17E00002900	GREEN, VIVETTE LEE TRUST	2033 SW EASTWOOD AV	GRESHAM	OR	97080	2033 SW EASTWOOD AV GRESHAM, OR 97080
02S17E00003000	MOORE, CHRISTOPHER & PATTI	65578 LONEROCK RD	MORO	OR	97039	65578 LONEROCK RD MORO, OR 97039
02S17E0000301	HART, DARRYL & TERESA	63461 FRASER ROAD	MORO	OR	97039	63461 FRASER ROAD MORO, OR 97039
02S17E00003400	BARNUM, RICHARD	3141 BUTTE STREET	KLAMATH FALLS	OR	97601	3141 BUTTE STREET KLAMATH FALLS, OR 97601
02S17E00003500	STRADLEY, RICHARD	PO BOX 66	GRASS VALLEY	OR	97029	PO BOX 66 GRASS VALLEY, OR 97029
02S17E00003600	STRADLEY, RICHARD	PO BOX 66	GRASS VALLEY	OR	97029	PO BOX 66 GRASS VALLEY, OR 97029
02S17E00003700	SHEPARD, DONNA KAY	3008 W GRACE STREET	BOISE	ID	83703	3008 W GRACE STREET BOISE, ID 83703
02S17E00003800	CAMPBELL, STEPHEN FARM & CABIN TRUST	PO BOX 370	MORO	OR	97039	PO BOX 370 MORO, OR 97039
02S17E00003801	SIMPSON, NANCY J & RICHARD C	PO BOX 165	MORO	OR	97039	PO BOX 165 MORO, OR 97039
02S17E0000400	STEWART, BRUCE & BETTY	PO BOX 397	DENAIR	CA	95316	PO BOX 397 DENAIR, CA 95316
02S17E00004100	LONG, SUSAN K & WILFORD C TRST	4005 S W JERALD WAY	PORTLAND	OR	97221	4005 S W JERALD WAY PORTLAND, OR 97221
02S17E00004300	LONG, SUSAN K & WILFORD C TRST	4005 SW JERALD WAY	PORTLAND	OR	97221	4005 SW JERALD WAY PORTLAND, OR 97221
02S17E00004500	PADGET, G DALE & DEANNA D TRST	60945 LONEROCK ROAD	GRASS VALLEY	OR	97029	60945 LONEROCK ROAD GRASS VALLEY, OR 97029
02S17E00004600	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	60744 LONE ROCK ROAD GRASS VALLEY, OR 97029
02S17E00004601	BLAGG, KYLE J	2001 S FLINT ROAD	SPOKANE	WA	99224	2001 S FLINT ROAD SPOKANE, WA 99224
02S17E00004800	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	60744 LONE ROCK ROAD GRASS VALLEY, OR 97029
02S17E00004900	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	60744 LONE ROCK ROAD GRASS VALLEY, OR 97029
02S17E0000500	BELSHÉ, JAMES R & JERRINE A	PO BOX 327	WASCO	OR	97065	PO BOX 327 WASCO, OR 97065
02S17E00005000	BARNETT, LEE	131 VALLEY VIEW LANE	BUTTE	MT	59701	131 VALLEY VIEW LANE BUTTE, MT 59701
02S17E00005100	KOCK FARMS LLC	PO BOX 6	GRASS VALLEY	OR	97029	PO BOX 6 GRASS VALLEY, OR 97029
02S17E00005200	PACIFIC MOTORSPORTS MGMT LLC	PO BOX 386	BEAVERTON	OR	97075	PO BOX 386 BEAVERTON, OR 97075
02S17E00005300	ROLFE LAND & CATTLE CO LLC	96000 ROSEBUSH LN	GRASS VALLEY	OR	97029	96000 ROSEBUSH LN GRASS VALLEY, OR 97029
02S17E00005400	ROLFE LAND & CATTLE CO LLC	96000 ROSEBUSH LN	GRASS VALLEY	OR	97029	96000 ROSEBUSH LN GRASS VALLEY, OR 97029
02S17E00005500	HELEN OLDS RANCH LLC	PO BOX 52	GRASS VALLEY	OR	97029	PO BOX 52 GRASS VALLEY, OR 97029
02S17E00005600	ZIEGLER FARMS LLC	33421 OR-224 UNIT #24	ESTACADA	OR	97023	33421 OR-224 UNIT #24 ESTACADA, OR 97023
02S17E0000600	HOCKS, BARBARA D	15130 S MAPLE LANE RD #36	OREGON CITY	OR	97045-8881	15130 S MAPLE LANE RD #36 OREGON CITY, OR 97045-8881
02S17E0000601	MARTIN, AUSTEN	PO BOX 331	MORO	OR	97039	PO BOX 331 MORO, OR 97039
02S17E0000700	POWELL, PATRICK A TRUSTEE	PO BOX 440	WASCO	OR	97065	PO BOX 440 WASCO, OR 97065
02S17E0000800	BELSHÉ, JAMES R & JERRINE A	PO BOX 327	WASCO	OR	97065	PO BOX 327 WASCO, OR 97065
02S17E0000900	OLSEN PROPERTIES LLC	64981 OLSEN ROAD	MORO	OR	97039	64981 OLSEN ROAD MORO, OR 97039
03S16E0000200	BUCK HOLLOW RANCH INC	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	59720 TWIN LAKES ROAD GRASS VALLEY, OR 97029
03S16E0200100	BUCK HOLLOW RANCH INC	59720 TWIN LAKES ROAD	GRASS VALLEY	OR	97029	59720 TWIN LAKES ROAD GRASS VALLEY, OR 97029
03S17E00001100	KOCK, JULIA O'HARA	1027 OLD HWY 8	ROOSEVELT	WA	99356-9717	1027 OLD HWY 8 ROOSEVELT, WA 99356-9717
03S17E0000400	PADGET, G DALE & DEANNA D TRST	60945 LONEROCK ROAD	GRASS VALLEY	OR	97029	60945 LONEROCK ROAD GRASS VALLEY, OR 97029
03S17E0000500	WHEELER, MICK S.	60335 HORSESHOE BEND ROAD	GRASS VALLEY	OR	97029	60335 HORSESHOE BEND ROAD GRASS VALLEY, OR 97029
03S17E0000600	PADGET, DARREN D & BRENDA J	95908 RUTLEDGE LANE	GRASS VALLEY	OR	97029	95908 RUTLEDGE LANE GRASS VALLEY, OR 97029
03S17E0000601	BLAGG, CARRIE L TRUSTEE	60744 LONE ROCK ROAD	GRASS VALLEY	OR	97029	60744 LONE ROCK ROAD GRASS VALLEY, OR 97029
03S17E0000700	ZIEGLER FARMS LLC	33421 OR-224 UNIT #24	ESTACADA	OR	97023	33421 OR-224 UNIT #24 ESTACADA, OR 97023
03S17E0000901	VON BORSTEL, LEE A	56424 VON BORSTEL ROAD	GRASS VALLEY	OR	97029	56424 VON BORSTEL ROAD GRASS VALLEY, OR 97029

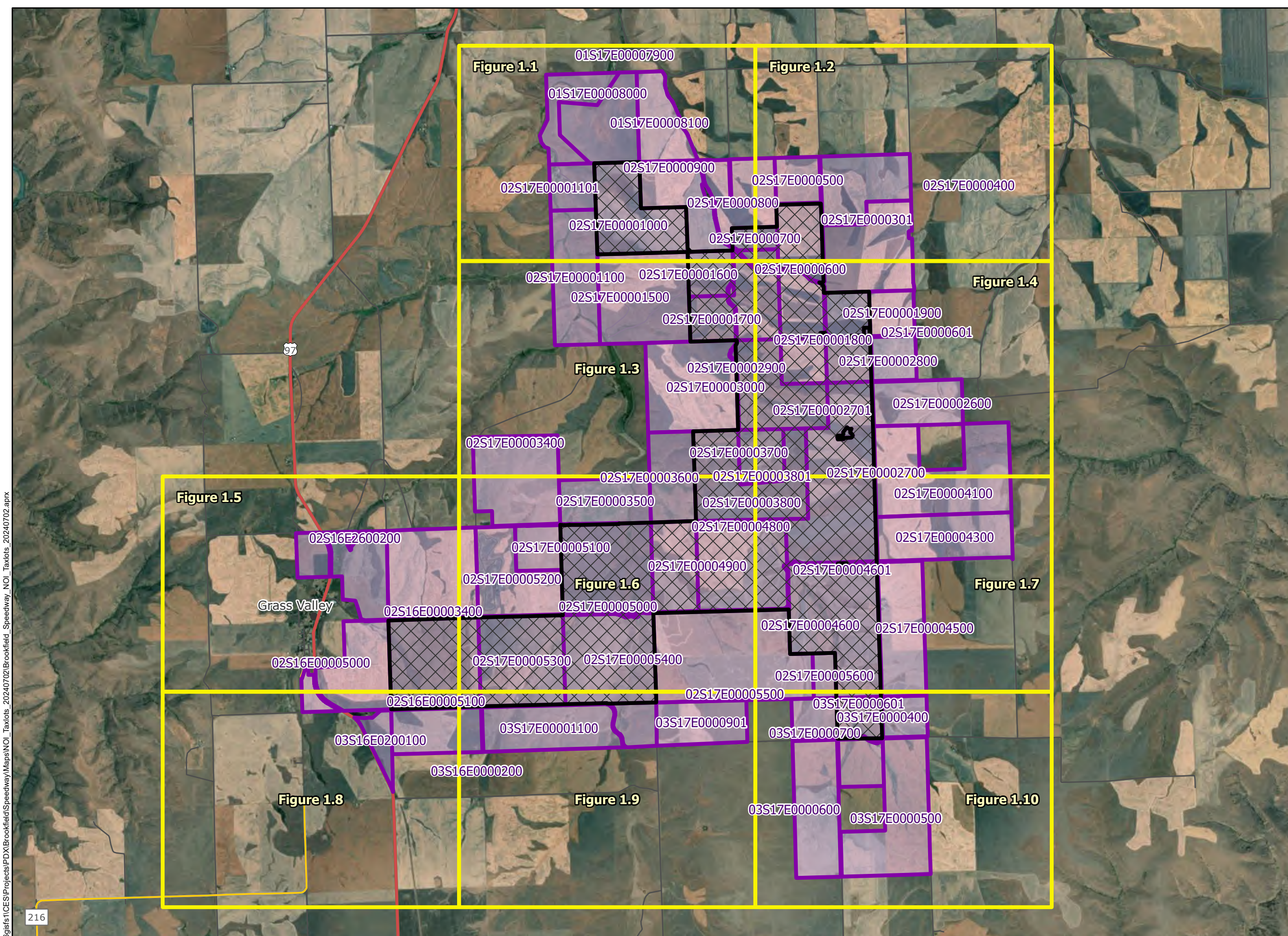
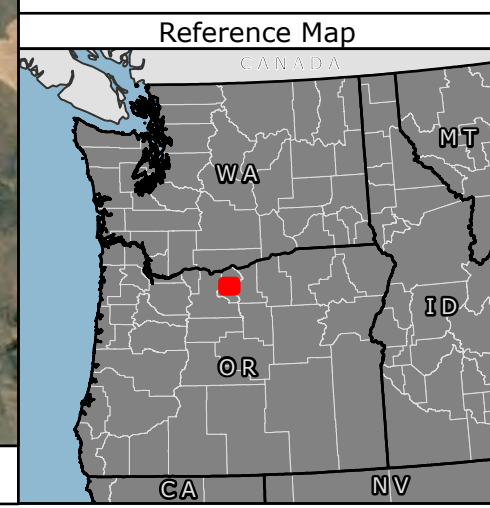
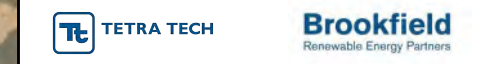
Speedway Solar Facility

Attachment 2 Figure 1 Tax Lot Boundary Index Map

SHERMAN COUNTY, OR

-  Map Grid
-  Facility Site Boundary
-  Taxlot Boundary¹
-  City/Town
-  US Highway
-  State Highway
-  Local Roads

¹Data received from Sherman County
07/02/2024






\\ces706g\jst\1\CES\Projects\PD\X\Brookfield\Speedway\Maps\NOI_Taxlots_20240702.aprx

Speedway Solar Facility

Attachment 2 Figure 1.1 Tax Lot Boundary Detail Map

SHERMAN COUNTY, OR

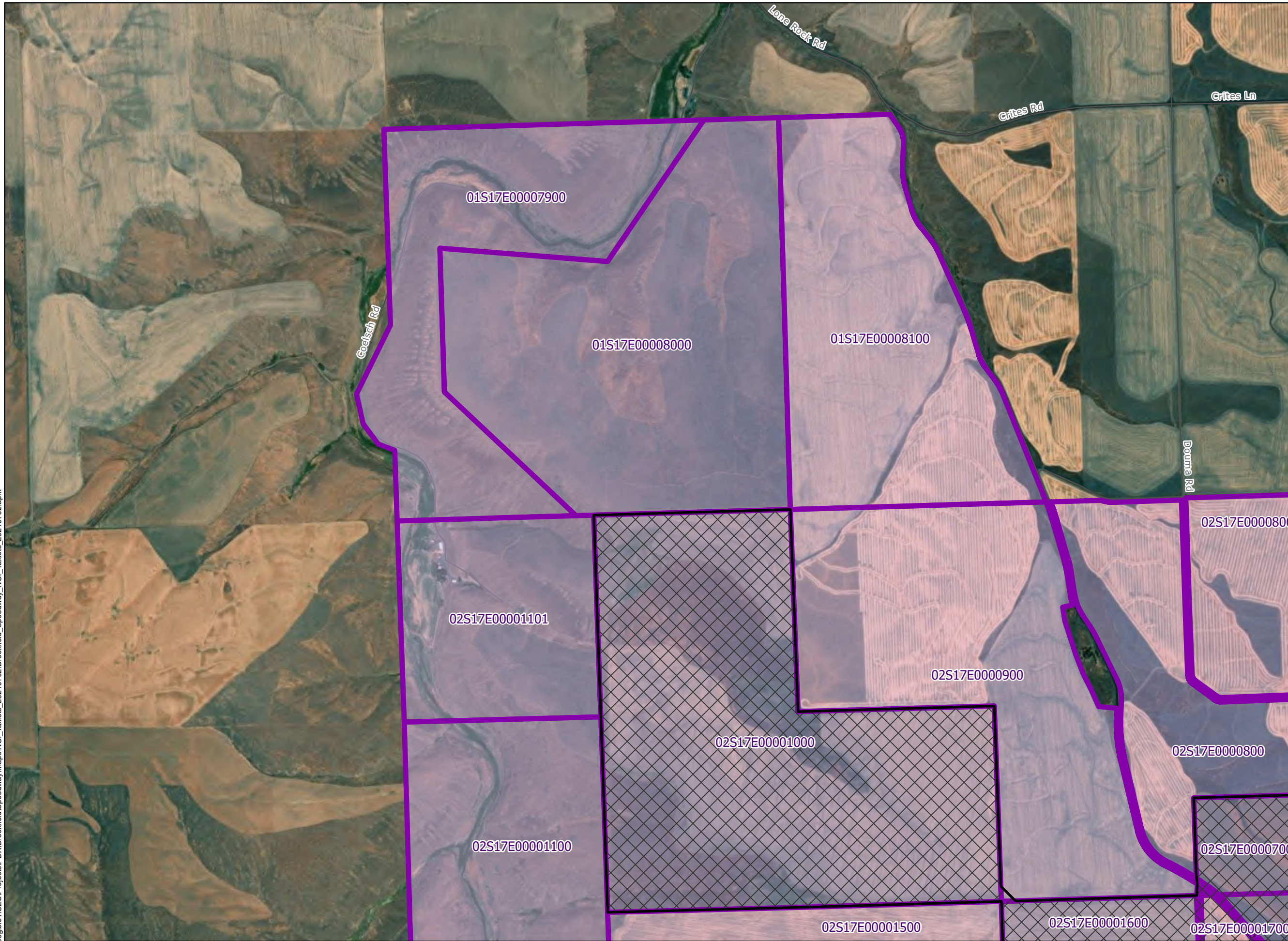
-  Facility Site Boundary
-  Taxlot Boundary¹
-  Local Roads

¹Data received from Sherman County
07/02/2024



Reference Map

Figure 1.1	Figure 1.2	
Figure 1.3	Figure 1.4	
Figure 1.5	Figure 1.6	Figure 1.7
Figure 1.8	Figure 1.9	Figure 1.10

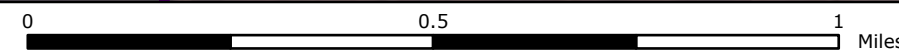


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WGS 1984 UTM Zone 10N






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Speedway Solar Facility

Attachment 2 Figure 1.2 Tax Lot Boundary Detail Map











SHERMAN COUNTY, OR

-  Facility Site Boundary
-  Taxlot Boundary¹
-  Local Roads

¹Data received from Sherman County
07/02/2024



Reference Map

 Figure 1.1	 Figure 1.2	
 Figure 1.3	 Figure 1.4	
 Figure 1.5	 Figure 1.6	 Figure 1.7
 Figure 1.8	 Figure 1.9	 Figure 1.10

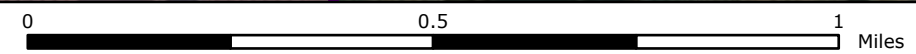


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WGS 1984 UTM Zone 10N






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Speedway Solar Facility

**Attachment 2
Figure 1.3
Tax Lot Boundary Detail Map**

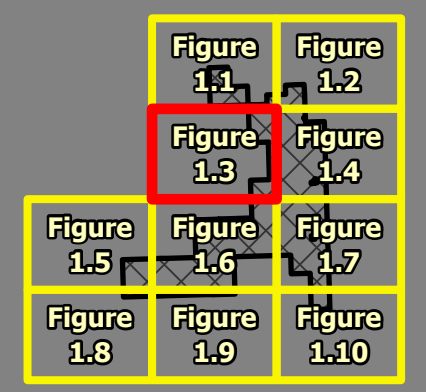
SHERMAN COUNTY, OR

-  Facility Site Boundary
-  Taxlot Boundary¹
-  Local Roads

¹Data received from Sherman County 07/02/2024



Reference Map

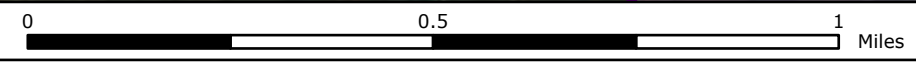


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Speedway Solar Facility

Attachment 2 Figure 1.4 Tax Lot Boundary Detail Map

SHERMAN COUNTY, OR

-  Facility Site Boundary
-  Taxlot Boundary¹
-  Local Roads

¹Data received from Sherman County
07/02/2024



Reference Map

Figure 1.1	Figure 1.2	
Figure 1.3	Figure 1.4	
Figure 1.5	Figure 1.6	Figure 1.7
Figure 1.8	Figure 1.9	Figure 1.10

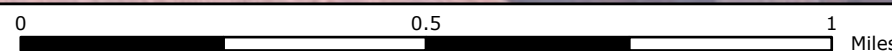


\\Cess706\gis\1\CES\Projects\PD\X\Brookfield\Speedway\Maps\NOI_Taxlots_20240702\Brookfield_Speedway_NOI_Taxlots_20240702.aprx

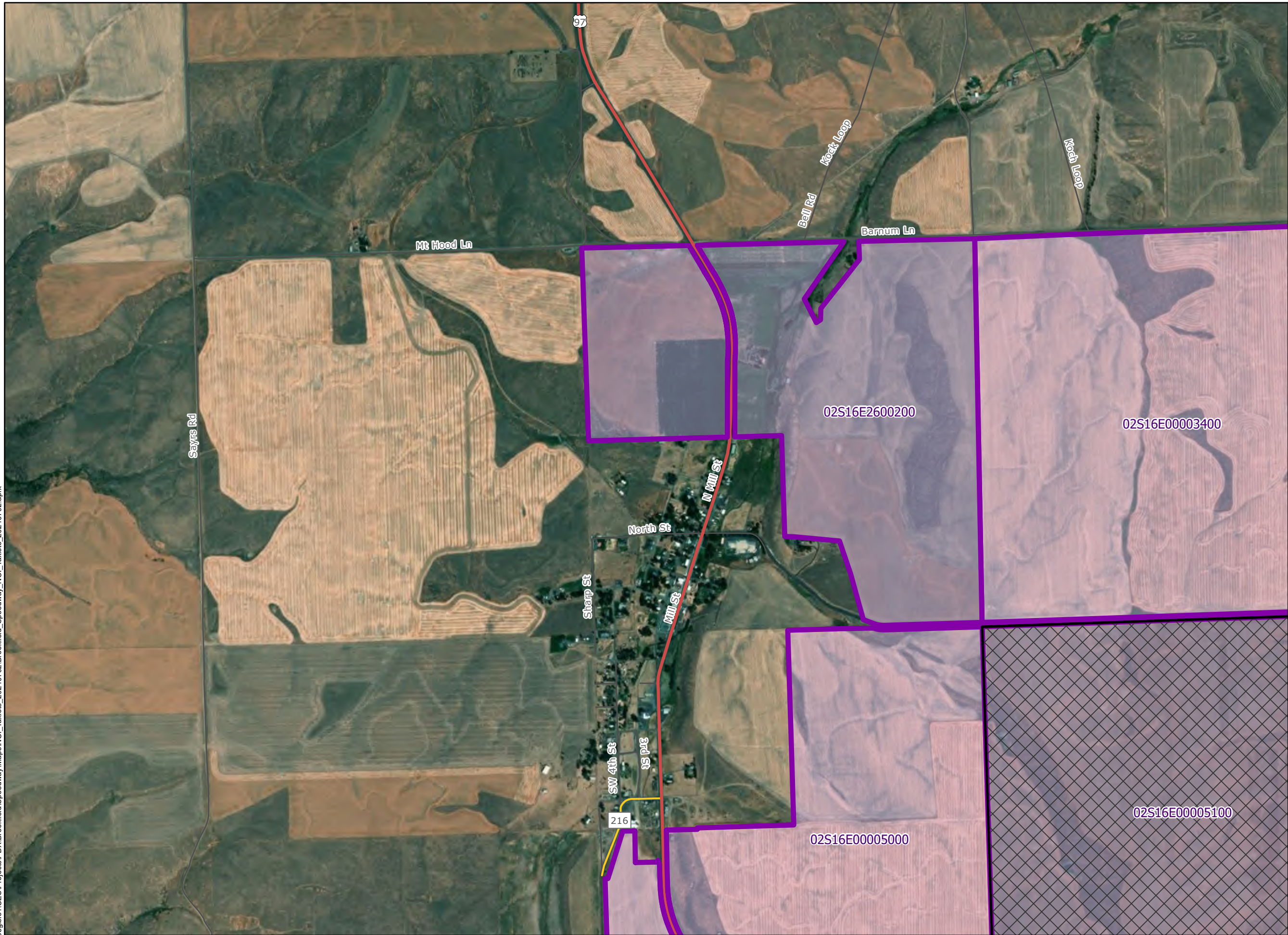


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Speedway Solar Facility

Attachment 2
Figure 1.5
Tax Lot Boundary Detail Map

SHERMAN COUNTY, OR

- Facility Site Boundary
- Taxlot Boundary¹
- US Highway
- State Highway
- Local Roads

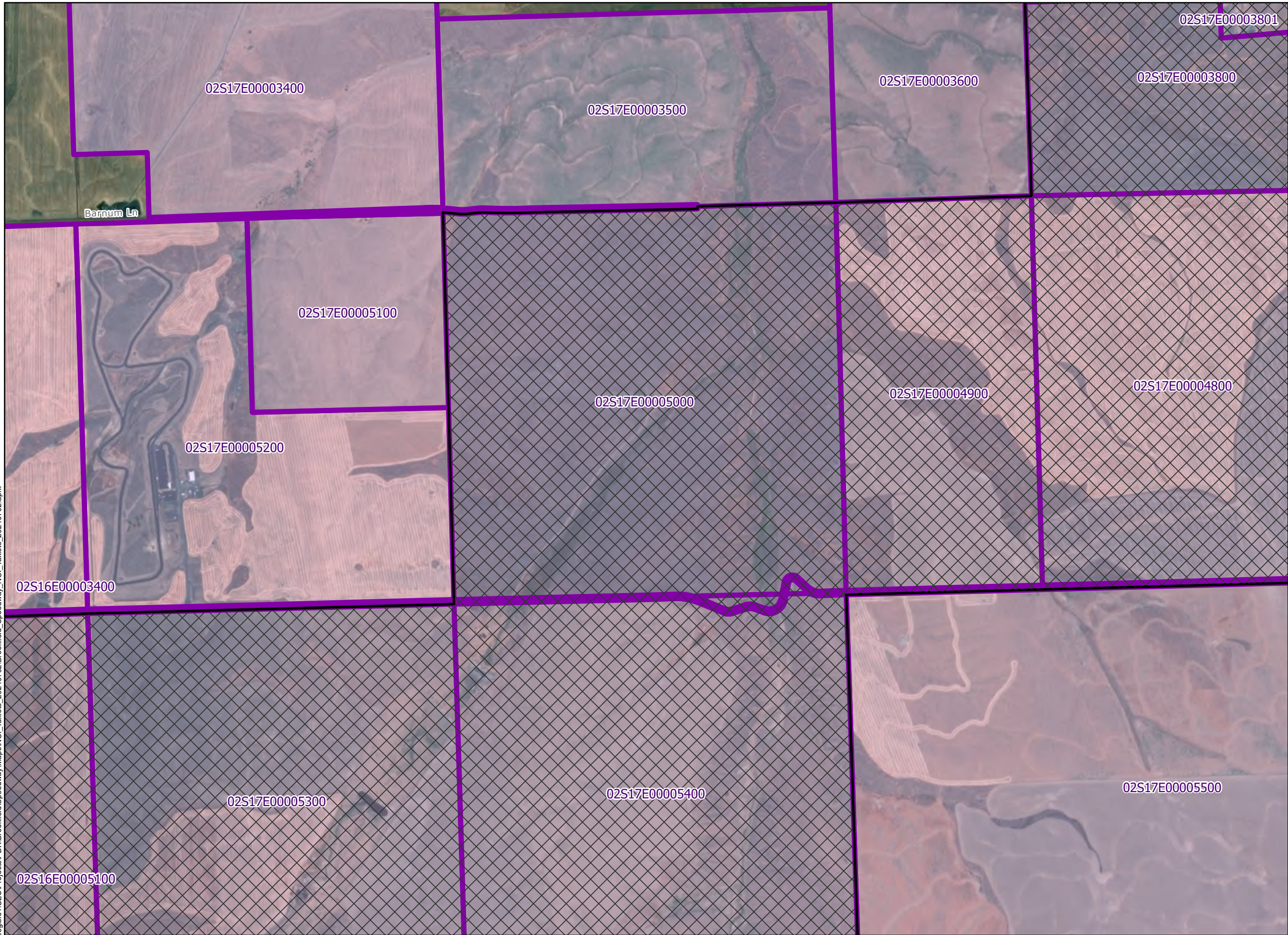
¹Data received from Sherman County
07/02/2024



Reference Map

Figure 1.1	Figure 1.2
Figure 1.3	Figure 1.4
Figure 1.5	Figure 1.6
Figure 1.7	Figure 1.8
Figure 1.9	Figure 1.10




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Speedway Solar Facility

**Attachment 2
Figure 1.6
Tax Lot Boundary Detail Map**

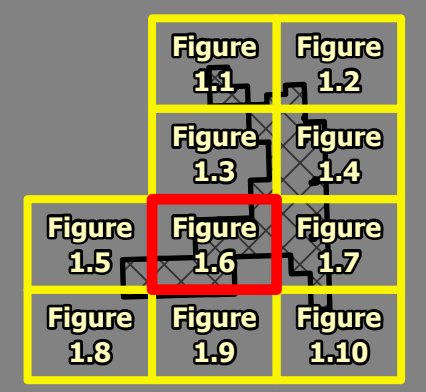
SHERMAN COUNTY, OR

-  Facility Site Boundary
-  Taxlot Boundary¹
-  Local Roads

¹Data received from Sherman County
07/02/2024



Reference Map

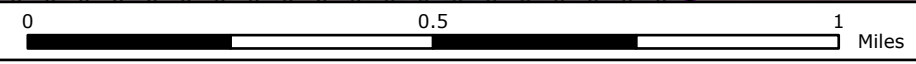


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Attachment 2 Figure 1.7 Tax Lot Boundary Detail Map

SHERMAN COUNTY, OR

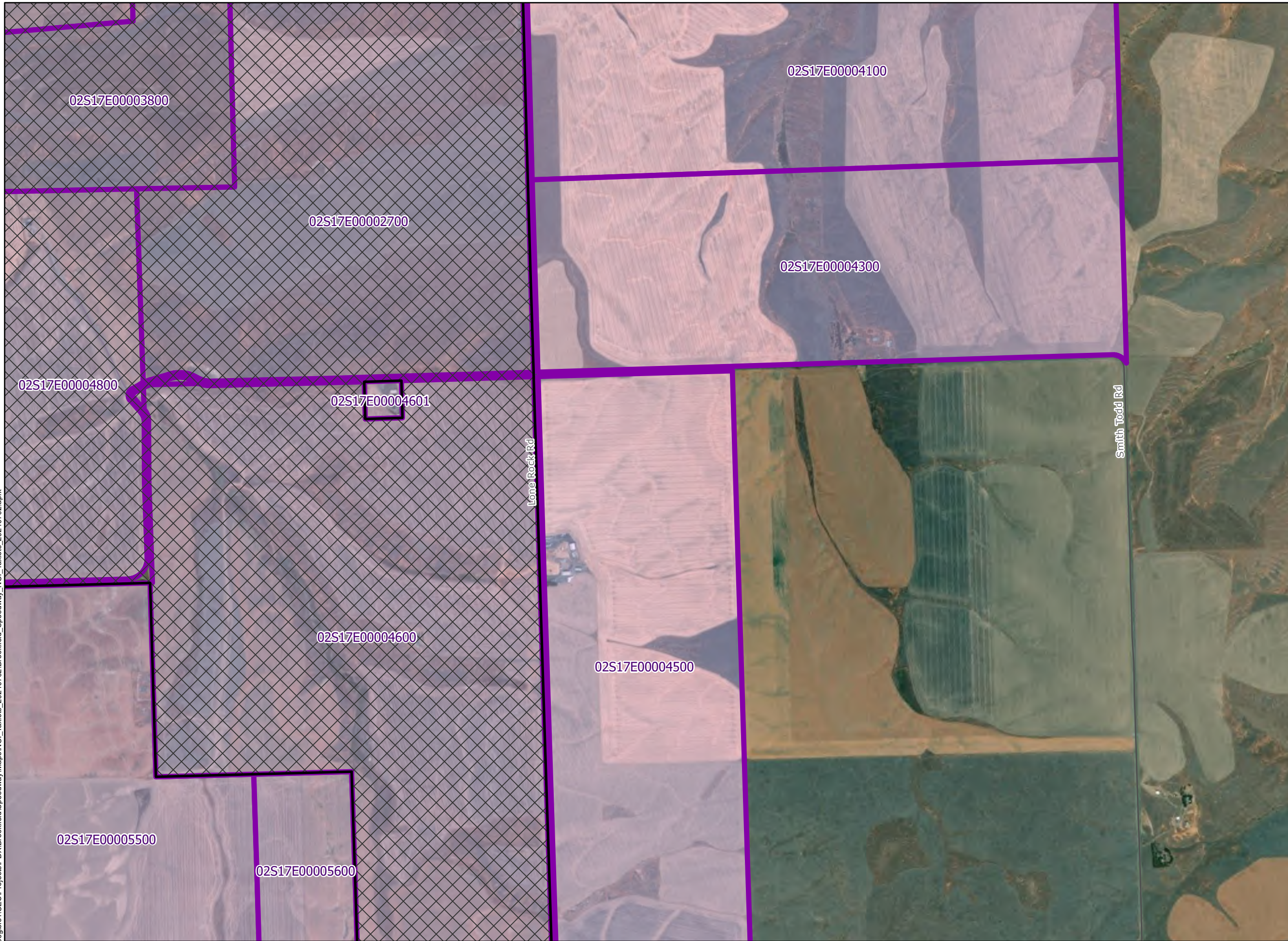
-  Facility Site Boundary
-  Taxlot Boundary¹
-  Local Roads

¹Data received from Sherman County
07/02/2024



Reference Map

Figure 1.1	Figure 1.2	
Figure 1.3	Figure 1.4	
Figure 1.5	Figure 1.6	Figure 1.7
Figure 1.8	Figure 1.9	Figure 1.10

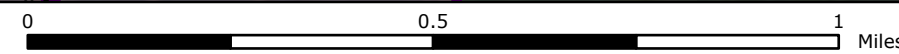


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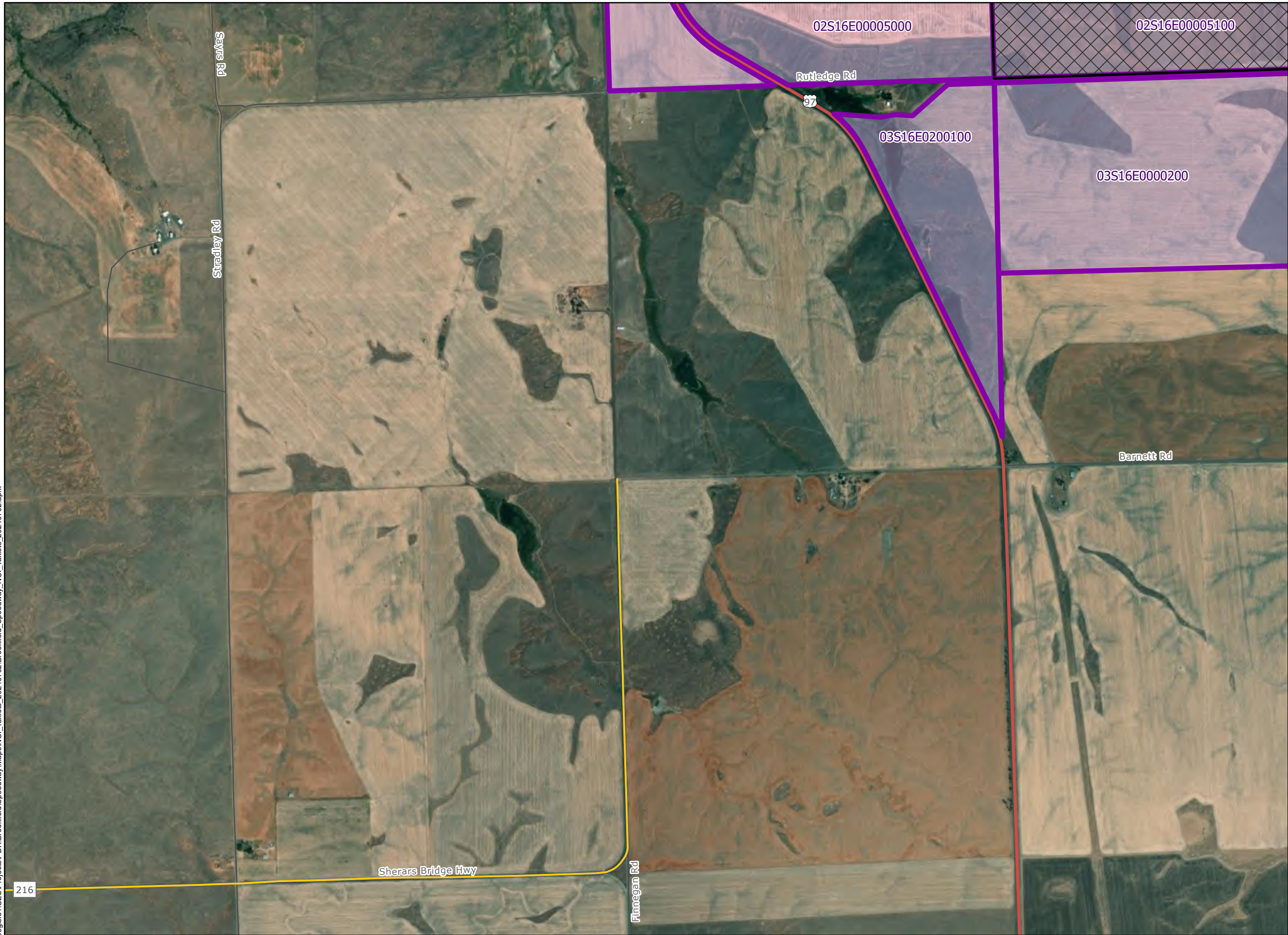


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Speedway Solar Facility

**Attachment 2
Figure 1.8
Tax Lot Boundary Detail
Map**

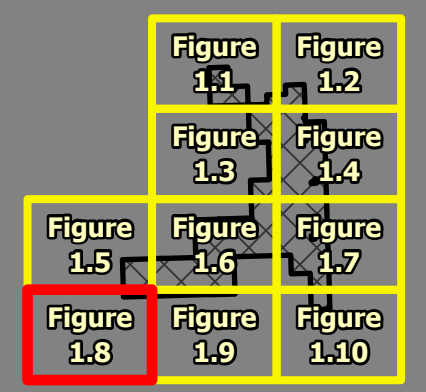
SHERMAN COUNTY, OR

-  Facility Site Boundary
-  Taxlot Boundary¹
-  US Highway
-  State Highway
-  Local Roads

¹Data received from Sherman County
07/02/2024



Reference Map



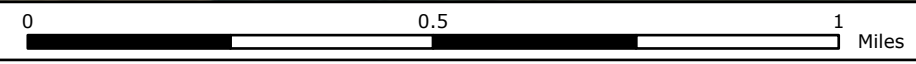
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216

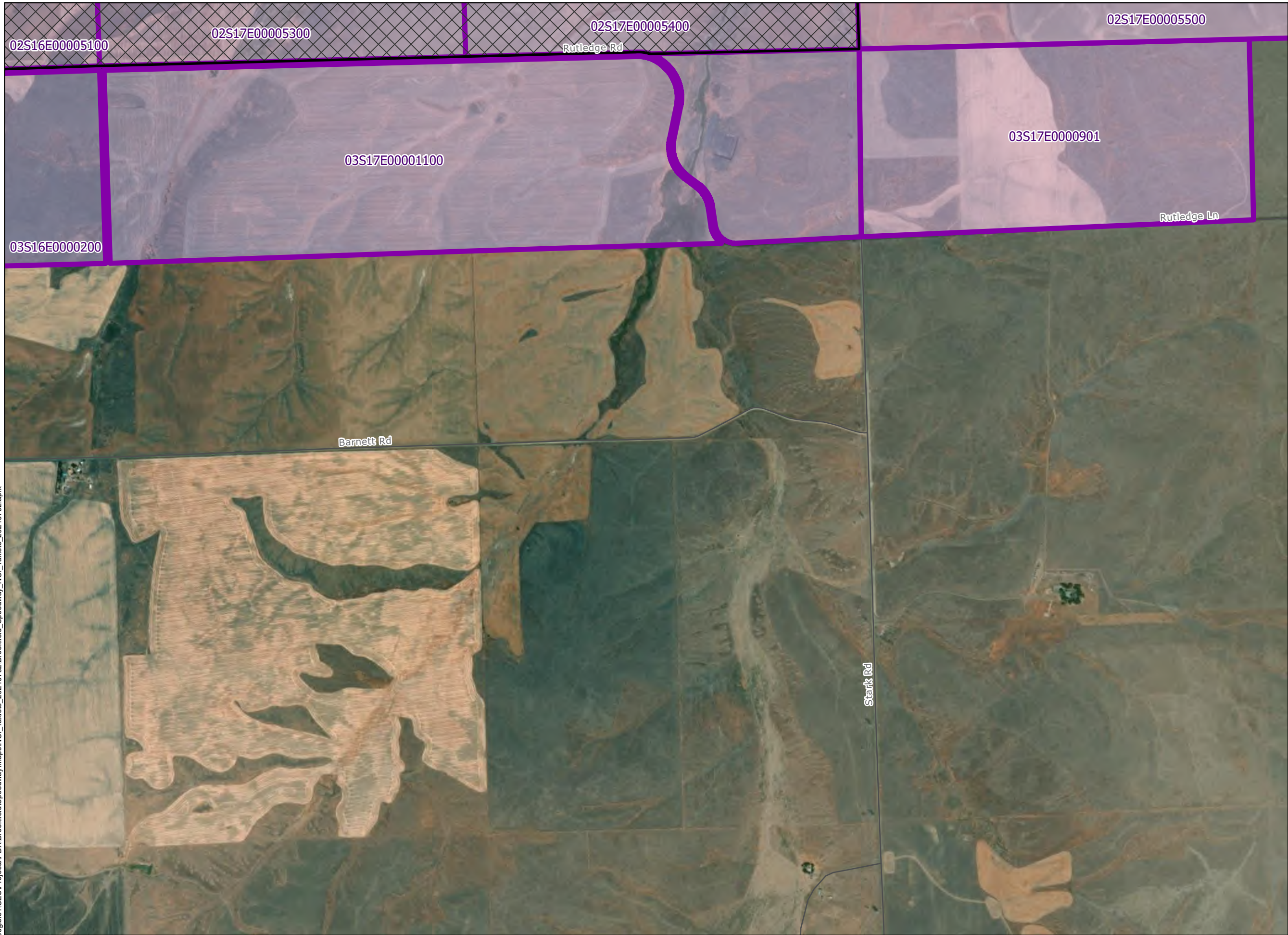


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Speedway Solar Facility

**Attachment 2
Figure 1.9
Tax Lot Boundary Detail
Map**

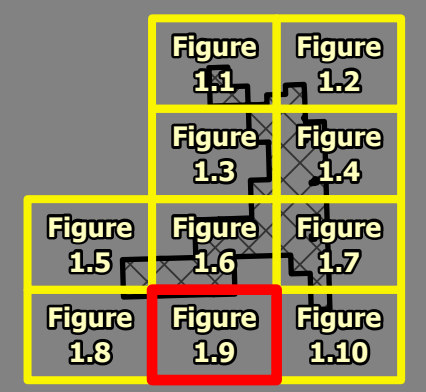
SHERMAN COUNTY, OR

-  Facility Site Boundary
-  Taxlot Boundary¹
-  Local Roads

¹Data received from Sherman County
07/02/2024



Reference Map

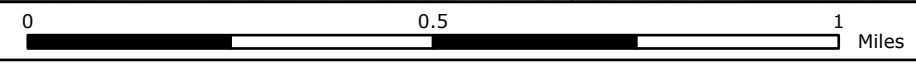


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Attachment 2 Figure 1.10 Tax Lot Boundary Detail Map

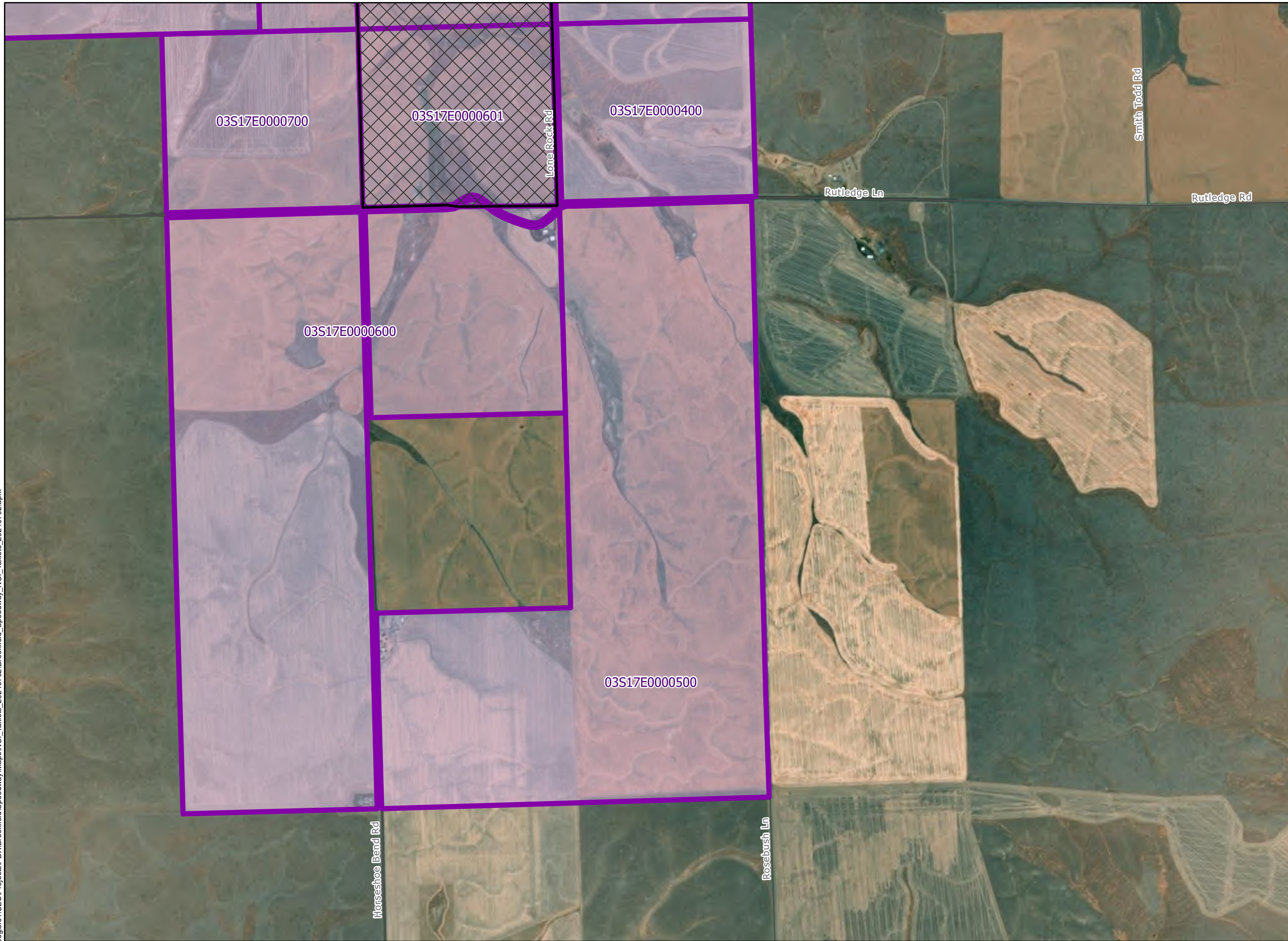
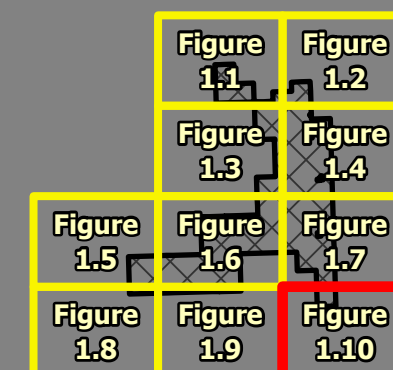
SHERMAN COUNTY, OR

-  Facility Site Boundary
-  Taxlot Boundary¹
-  Local Roads

¹Data received from Sherman County
07/02/2024



Reference Map

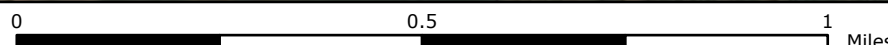


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Grace, Jordan

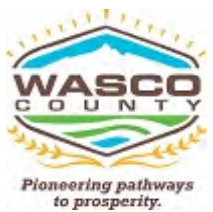
From: Grace, Jordan
Sent: Wednesday, July 17, 2024 7:04 PM
To: Grace, Jordan
Subject: Sherman County Taxlot Request
Attachments: GB Invoice - 1559_07-02-2024_TETRATECH.pdf

From: Jaime Solars <jaimes@co.wasco.or.us>
Sent: Tuesday, July 2, 2024 10:56 AM
To: Jewell, Lana <LANA.JEWELL@tetrattech.com>
Subject: Re: Sherman County Taxlot Request

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

Hi Lana,

Here is the data requested and the invoice. Please let me know if you need anything else!
Jaime



Jaime Solars Rathmell, GISP | GIS Analyst
INFORMATION SERVICES

jaimes@co.wasco.or.us | www.co.wasco.or.us
541-506-2659 | Fax 541-506-2641
2705 E. 2nd St | The Dalles, OR 97058

On Fri, Jun 28, 2024 at 2:58 PM Jewell, Lana <LANA.JEWELL@tetrattech.com> wrote:

Hi Jaime,

I'd like to request the taxlots that intersect the attached AOI shapefile. It'd be great if we could get these before the end of next week. Let me know if you need anything else for this request; thank you in advance for your help!

Thanks again,

Lana Jewell

Lana Jewell | GIS Scientist

Direct +1 (503) 721-7232 | Mobile +1 (971) 404-4051 | Lana.Jewell@tetrattech.com

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Attachment 3. Correspondence with Legislative Commission on Indian Services

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From: [Bullion Elissa](#)
To: [Grace, Jordan](#)
Subject: RE: Request for info on area tribal contacts for a solar project in Sherman County
Date: Tuesday, April 30, 2024 4:10:15 PM
Attachments: [image002.png](#)

You don't often get email from elissa.bullion@oregonlegislature.gov. [Learn why this is important](#)

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

Good afternoon Jordan,

Thank you for reaching out and providing this information on your project. For this area in Sherman Co., I recommend contacting the following Tribes:

Burns Paiute Tribe
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of Warm Springs Reservation of Oregon

Contact information for culture and heritage Tribal staff can be found on our website: [Commission on Indian Services archaeology \(oregonlegislature.gov\)](#).

Please let me know if you have any questions.

Best,

Elissa

Dr. Elissa Bullion, PhD (she/her/hers)
State Physical Anthropologist
Legislative Commission on Indian Services
Oregon State Capitol Building
900 Court Street, NE, Room 167
Salem, Oregon 97301
Phone: 971-707-1372
LCIS Office: 503-986-1067
Elissa.Bullion@oregonlegislature.gov



From: Grace, Jordan <JORDAN.GRACE@tetrattech.com>
Sent: Tuesday, April 30, 2024 2:25 PM
To: LCIS <LCIS@oregonlegislature.gov>
Cc: Seilo, Paul <PAUL.SEILO@tetrattech.com>; Rahmig, Troy <TROY.RAHMIG@tetrattech.com>
Subject: Request for info on area tribal contacts for a solar project in Sherman County

CAUTION: This email originated from outside the Legislature. Use caution clicking any links or attachments.

Hello,

I'm working for a client that's exploring development of a photovoltaic solar energy generation project in Sherman County, Oregon. The area being explored is shown on the attached map and intersects the following townships and ranges: 1S 17E, 2S 16E, 2S 17E, 2S 18E, 3S 16E, 3S 17E, 3S 18E. The project proponent will conduct cultural resource file searches through the State Historic Preservation Office and field surveys within the project area. We respectfully request your assistance with identifying appropriate tribes to consult with regarding tribal historic and cultural resources in the vicinity of the project.

Thank you very much for your assistance.

Regards,

Jordan Grace (he/him) | Environmental Planner
Direct +1 (503) 727-8074 | Mobile +1 (714) 580-9006 | jordan.grace@tetrattech.com

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1750 S Harbor Way, Suite 400 | Portland, OR 97201 | tetrattech.com



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