



December 12, 2024

Sarah T. Esterson, Senior Policy Advisor  
Oregon Department of Energy  
550 Capitol St. NE  
Salem, OR 97301

Re: Leaning Juniper IIA Wind Power Facility – Amendment Determination Request

Dear Sarah,

Thank you for the telephone call on November 6 to discuss minor modifications that are needed to accommodate detailed planning for construction of the repower effort authorized under Amendment 3 to the Site Certificate for the Leaning Juniper IIA Wind Power Facility (“Project”). Leaning Juniper Wind Power II, LLC, a wholly owned subsidiary of Avangrid Renewables, LLC (“Certificate Holder”) submits this Amendment Determination Request (“ADR”) to confirm that three modifications to the Leaning Juniper IIA Wind Power Facility (“Facility”) do not trigger an amendment of the Third Amended Site Certificate, dated June 12, 2024 (“Site Certificate”). Certificate Holder is finalizing the Facility repower design and three modifications are needed to facilitate repower mobilization. These modifications consist of a crane walk reroute to avoid potential safety hazards; a modification to the allowed work area for the two turbines that will be decommissioned; and build-out of additional storage yard area at the Operations and Maintenance Building.

These three modifications amount to a change in the Facility design, construction, or operation; however, none trigger any one of the “three could’s” in OAR 345-027-0350(4)(a)-(c). For the reasons provided in the attached amendment determination request, Certificate Holder requests that the Oregon Department of Energy (“ODOE”) concur with the proposed findings in this ADR and conclude that no amendment is needed.

We request that you process this ADR expeditiously to the extent possible. Thank you for your consideration, and we look forward to working with the Department to obtain your concurrence that no Site Certificate amendment is required.

Sincerely,

Talia Haley  
Development Permitting Manager

Enclosure

LEANING JUNIPER WIND POWER II, LLC

LEANING JUNIPER IIA WIND POWER FACILITY

AMENDMENT DETERMINATION REQUEST

DECEMBER 12, 2024

## **Leaning Juniper IIA Wind Power Facility Project Background**

Leaning Juniper IIA Wind Power Facility is an operating wind energy facility with a peak generating capacity of approximately 98.4 megawatts. The facility consists of 42 turbines (a 43<sup>rd</sup> turbine was decommissioned in 2020). Amendment 3 to the Site Certificate authorized the Certificate Holder to repower 36 wind turbines, install new underground 34.5kV collector lines, and decommission two wind turbines, with accompanying temporary disturbance of up to approximately 396.2 acres within the “RFA3 repower corridor”.

### **Amendment Determination Request**

- **Modification 1. Reroute Crane Path to Existing Roadway.** Crane walk between turbines M1 and K2 needs to be rerouted to avoid potential safety hazards.
- **Modification 2. Designate Turbine Decommissioning Work Zone and Modify Decommissioning Method.** Due to safety hazards resulting from a previous fire at Turbine M3, the turbine cannot be disassembled but instead will be ‘felled’. This same method will be used at Turbine Z1 in order to significantly reduce temporary disturbance from crane walk.
- **Modification 3. Build-Out O&M Building Storage Yard as Originally Permitted.** The existing storage yard is 1 acre in size. The yard will be expanded to a total of 2 acres, which is the size described in the Site Certificate.

These three modifications amount to a change in the Facility design, construction, or operation; however, none trigger any one of the “three could’s” in OAR 345-027-0350(4)(a)-(c). Certificate Holder can still comply with the existing Site Certificate conditions and no condition change would be required to accommodate the modifications. Further, the modifications will not result in significant adverse impacts to resources protected by Council standards and will not result in impacts that the Council did not previously consider. For the reasons provided below, Certificate Holder requests that the Oregon Department of Energy (“ODOE”) concur with the proposed findings in this ADR and conclude that no amendment is needed.

#### **1. Modification 1, Reroute Crane Path to Existing Roadway**

Certificate Holder needs to walk the turbine crane between two turbines (Turbine M1 and Turbine K2) to avoid potential safety hazards with walking the crane past operating turbines that will not be repowered (see Figure 1). To avoid this route, the modified route of least disturbance requires Certificate Holder to use a temporary crane path that relies, in part, on an existing roadway outside of the Facility site boundary (northern portion). The southern portion of the temporary crane path, after the path leaves the existing road, would be within the repower micro-siting corridor as shown on Figure 2 of the Final Order on Amendment 3 (ODOE 2024, p. 7). The repower micro-siting corridor (green), original estimated limits of disturbance (blue), and the new temporary crane path (red) are shown in Figure 1. Certificate Holder proposes to use this crane walk once during the repower activities, for approximately two to four hours when walking the crane between Turbine M1 and Turbine K2.

The temporary crane path will be within the repower corridor that has been surveyed (except as noted below for WGS) or on an existing roadway that is already disturbed and not considered a

related or supporting facility. The repower microsite corridor was already surveyed for habitat, rare plants, and cultural resources. No wetlands or cultural resources were identified during surveys of this portion of the repower microsite corridor, and the area is mapped as Category 3 shrub-steppe habitat. All anticipated temporary disturbance has been previously evaluated and any temporary impact to Category 3 habitat will be mitigated in accordance with the Habitat Mitigation Plan. Approximately 500 feet of this new crane path, where the path would move off of the existing road to avoid overhead lines, was not surveyed for WGS (see Figure 2).

Certificate Holder does not anticipate using the temporary crane path until May 2025 or later, and plans to conduct protocol-level surveys within 1000 feet of the proposed disturbance area during the appropriate survey season in April 2025. Certificate Holder will provide a supplement to the 2023 Washington Ground Squirrel Report for ODOE and ODFW review and approval. Certificate Holder points ODOE to Condition 84 in the Site Certificate to assure that this work will be done and Certificate Holder will remain in compliance with Site Certificate conditions. Condition 84(e) of the Site Certificate provides that if construction would affect microsite areas that were not previously surveyed for WGS, Certificate Holder shall construct pre-construction surveys for those locations, notify ODOE of the findings, and implement appropriate avoidance and mitigation measures. Condition 84 is one of the conditions noted in the Site Certificate as being no longer being applicable to repower activities, however, ODOE did note that non-applicable conditions are kept in the Site Certificate “should there be a future change or facility modification for which certificate holder seeks to complete at the site and may rely on compliance with preconstruction and construction conditions to evaluate potential impacts and or need for a site certificate amendment given protections afforded through these historic conditions.” See Site Certificate, p18 Lines 24-28. It is clear from the Site Certificate language that this is the exact situation where a previously-imposed condition may be relied upon to ensure that impacts from the proposed modification are appropriately evaluated and impacts are avoided. The language also implies Certificate Holder, and ODOE, may rely on Condition 84 to avoid triggering and amendment to the Site Certificate.

If WGS are found during the Spring 2025 surveys, Certificate Holder will coordinate with ODOE and ODFW to determine the appropriate course of action to remain in compliance with Site Certificate conditions and protect WGS colonies and habitat.

## **2. Modification 2. Designate Turbine Decommissioning Work Zone and Modify Decommissioning Method**

Certificate Holder plans to decommission two turbines (Turbine M3 and Z1) as part of the repower activities. In finalizing the decommissioning steps for the turbines, Certificate Holder has learned that the contractor will require a modified decommissioning work zone around the turbine to accommodate the dismantling activities.

The reason for the modified decommissioning method is because Turbine M3 experienced a fire and is not safe to be climbed for disassembly prior to decommissioning. The modified decommissioning approach will allow turbines to be decommissioned without walking cranes to these two sites, and will address safety hazards involved with decommissioning the turbine that burned in February of 2023. Certificate Holder proposes decommissioning Turbine Z1 using the same method because it will reduce the safety risk associated with turbine removal. Additionally, using this procedure will eliminate approximately 8,500 linear feet of crane walking distance, and 4

culvert crossings. The turbines will be decommissioned by placing explosives at the tower base, causing the tower to fall in a designated direction to allow removal and disposal of turbine components. The following steps will be taken:

1. Terminate power to the unit as needed and complete removal of potentially hazardous materials such as transformer oils (where possible).
2. Confirm shell circumference and thickness of tower base. Confirm wind direction and velocity forecast and confirm wind direction and direction of fall such that the direction of fall will be away from the nacelle/blade.
3. Conduct preliminary burning on the tower for placement of explosives.
4. Place protection, to consist of multiple layers of ½" thick conveyor belt along with geotextile fabric around the base of the unit to minimize and contain fly of copper from the explosive charge
5. Place approximately 10 pounds of shaped charge explosives at the designated location on the tower base.
6. Clear the exclusion zone (at least two times turbine height). Establish command post and attach blasting caps to the initiation harness.
7. Clear adjacent roadways and post flagmen to halt traffic until the unit is on the ground and the 'all clear' has been provided.
8. Detonate the explosives.
9. Confirm full explosives detonation and inspect debris.
10. Clear debris for recycling or disposal as appropriate.
11. Soil will be examined to confirm no contamination has been released. In the event that contamination is released, affected soil will be immediately contained and treated in accordance with the SPCC plan.

The modified decommissioning work zone is a shift in the shape of the estimated disturbance area at each turbine location described in RFA3 and would not result in an overall increase in the disturbance area for the repower effort. As described in the Site Certificate, the disturbance area at each turbine location consists of an area estimated as a circle with a radius of 275 feet around each turbine. As defined in RFA3, the disturbance area is intended to accommodate equipment storage and vehicle traffic, and areas may be graded and/or vegetation may be removed to allow repower activities. At the two locations where decommissioning will occur (Turbines M3 and Z1), an approximately 2-acre supplemental work zone for each turbine extending up to approximately 250 feet beyond the 275-foot radius in one direction will be needed in order to accommodate the modified decommissioning approach (see Figures 3 and 4). This supplemental work zone is where portions of the decommissioned turbine will fall. Portions of the approved circular disturbance area will still be used for vehicle traffic and limited equipment placement but for the two turbines that will be decommissioned, the disturbance area close to the turbine foundation will not need to be as large because no crane will be required and no new blades or components will need to be staged. No vegetation removal or grading is proposed for the modified work zones where they are more than 275 feet from the turbine. It is Certificate Holder's position that these decommissioning work zones do not amount to an increase in temporary disturbance under the Site Certificate and further that the total disturbance area for the repower will not exceed the area analyzed during the Council's review of RFA3.

This supplemental work zone at these two turbine locations will not result in an overall increase in temporary disturbance associated with the repower action, but does result in activity outside of the maximum temporary disturbance specific to turbine pads as identified in Table 1 of the Site Certificate at these two locations (275 foot radius around turbine base). Table 1 is not a site certificate condition but it is part of the project description as presented in the site certificate.

This alternate decommissioning approach will not result in any new significant adverse impacts to resources protected by the Council because all disturbance will occur within previously surveyed areas and the Certificate Holder will continue to comply with all Site Certificate Conditions. Further, the total temporary disturbance will be reduced as a result of eliminating 8,500 linear feet of crane walk, resulting in an approximately 19-acre reduction (8,500 linear feet x 100-foot estimated width) in temporary disturbance associated with crane walks.

### **3. Modification 3, Build-Out O&M Building Storage Yard as Originally Permitted**

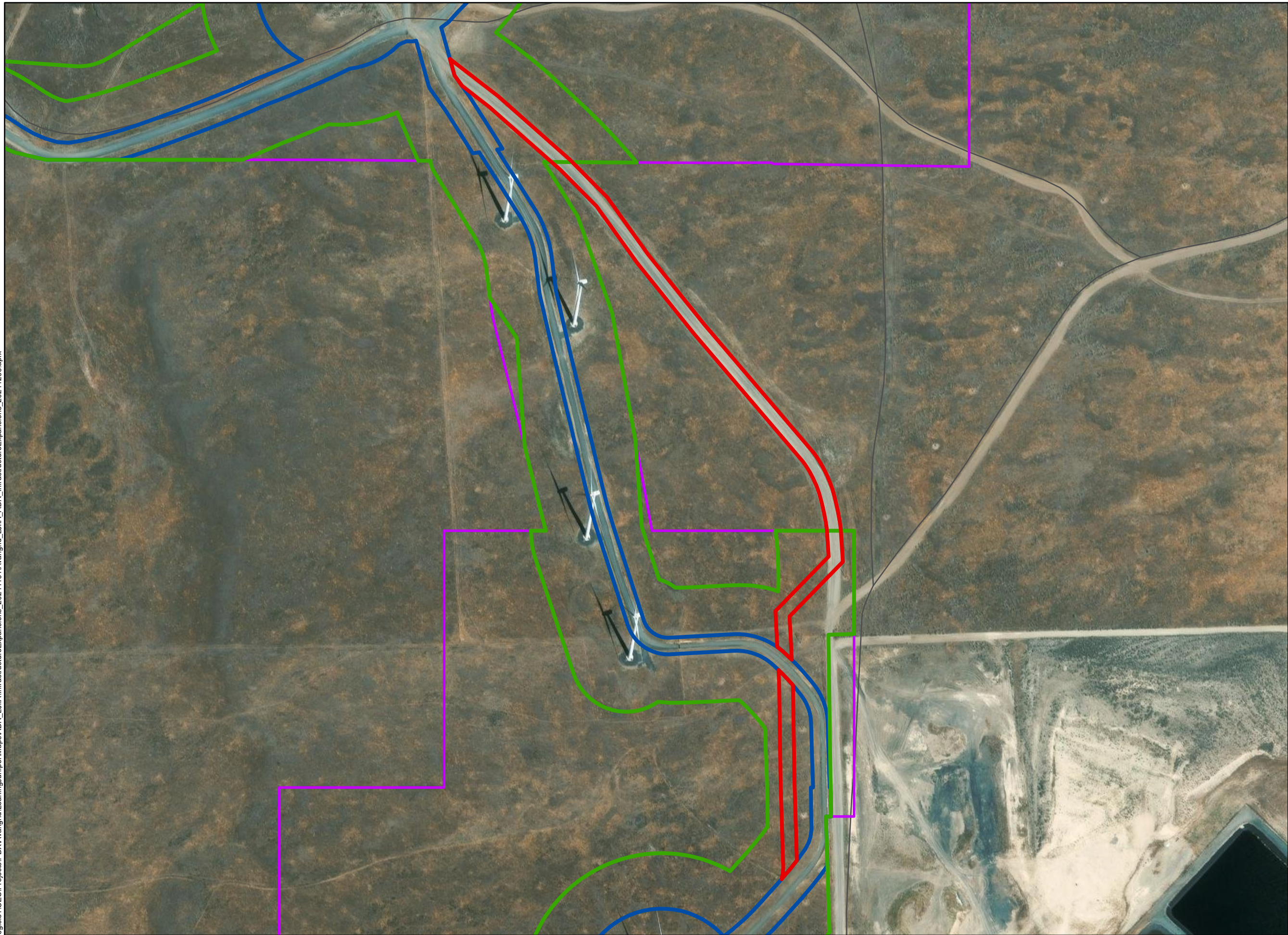
The Facility was previously approved for an O&M building with approximately 2.0 acres of fenced, graveled parking and storage area<sup>1</sup>. As constructed, the building itself occupies approximately 0.2 acre and is surrounded by approximately 1 acre of fenced, graveled parking and storage area. To improve facility operational flexibility following completion of the repower activity, Certificate Holder proposes to expand the existing storage area by approximately 1 acre, for a total of 2 acres of fenced, graveled storage and parking. See Figure 5.

This expanded storage area would occupy an area that was approved as part of Amendment 3 for laydown area. Instead of reclaiming this portion of the graveled laydown area following the repower effort, the area would be fenced and retained for operational use. The area has been fully surveyed for all resources and no new significant impacts would occur; however, one acre of land currently categorized as Category 3 Rabbitbrush-Snakeweed-Eriogonum/bunchgrass (SSA) would be permanently disturbed instead of temporarily disturbed. Mitigation for impacts to this habitat type were identified in the Final Order on Amendment #1 (EFSC 2009, Attachment C) at a ratio of 1 acre of mitigation for each 1 acre of impact. Because this land was already planned for mitigation at 0.5:1 ratio for temporary impacts, this would result in a net increase of 0.5 acre beyond the previously anticipated total. The Draft Habitat Mitigation Plan will be finalized as part of pre-construction compliance and this additional 0.5-acre requirement can be included with no new analysis or other new or modified site certificate conditions.

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<sup>1</sup> Leaning Juniper IIA Wind Power – Third Amended Site Certificate, June 12, 2024, p. 4.






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# Leaning Juniper IIA

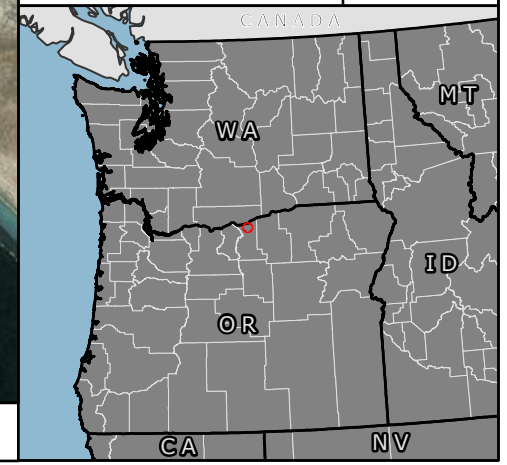
## Figure 1 Alternate Crane Path Location

GILLIAM COUNTY, OR

-  Site Boundary
-  Repower Micrositing Corridor
-  Original Estimated Temporary Disturbance Area
-  Alternate Crane Path
-  Local Roads

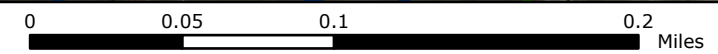


### Reference Map



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WGS 1984 UTM Zone 10N










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# Leaning Juniper IIA

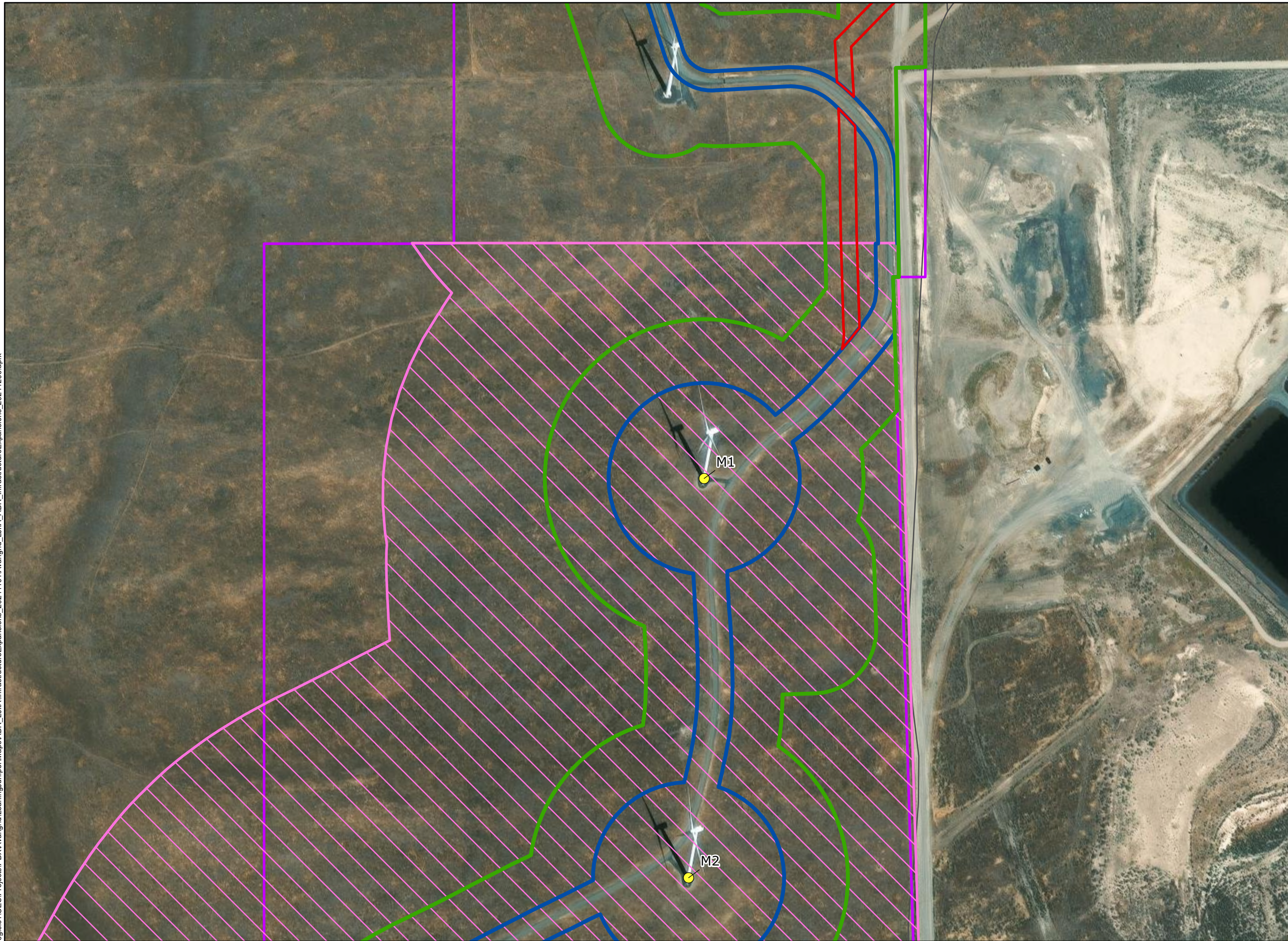
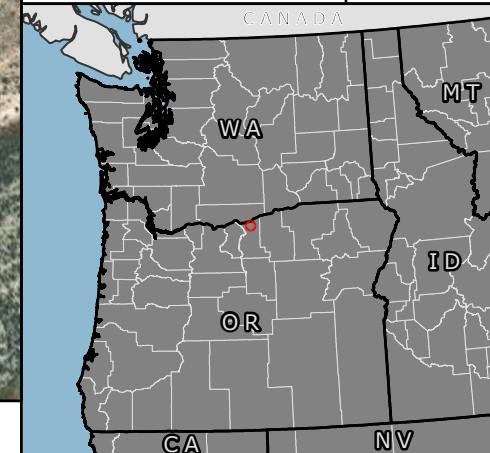
## Figure 2 Alternate Crane Path – Washington Ground Squirrel Survey Area

GILLIAM COUNTY, OR

-  Site Boundary
-  Repower Micrositing Corridor
-  Original Estimated Temporary Disturbance Area
-  Alternate Crane Path
-  2023 WAGS Survey Extent
-  Turbines
-  Local Roads



### Reference Map

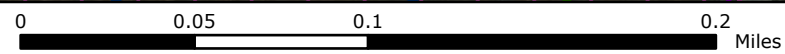


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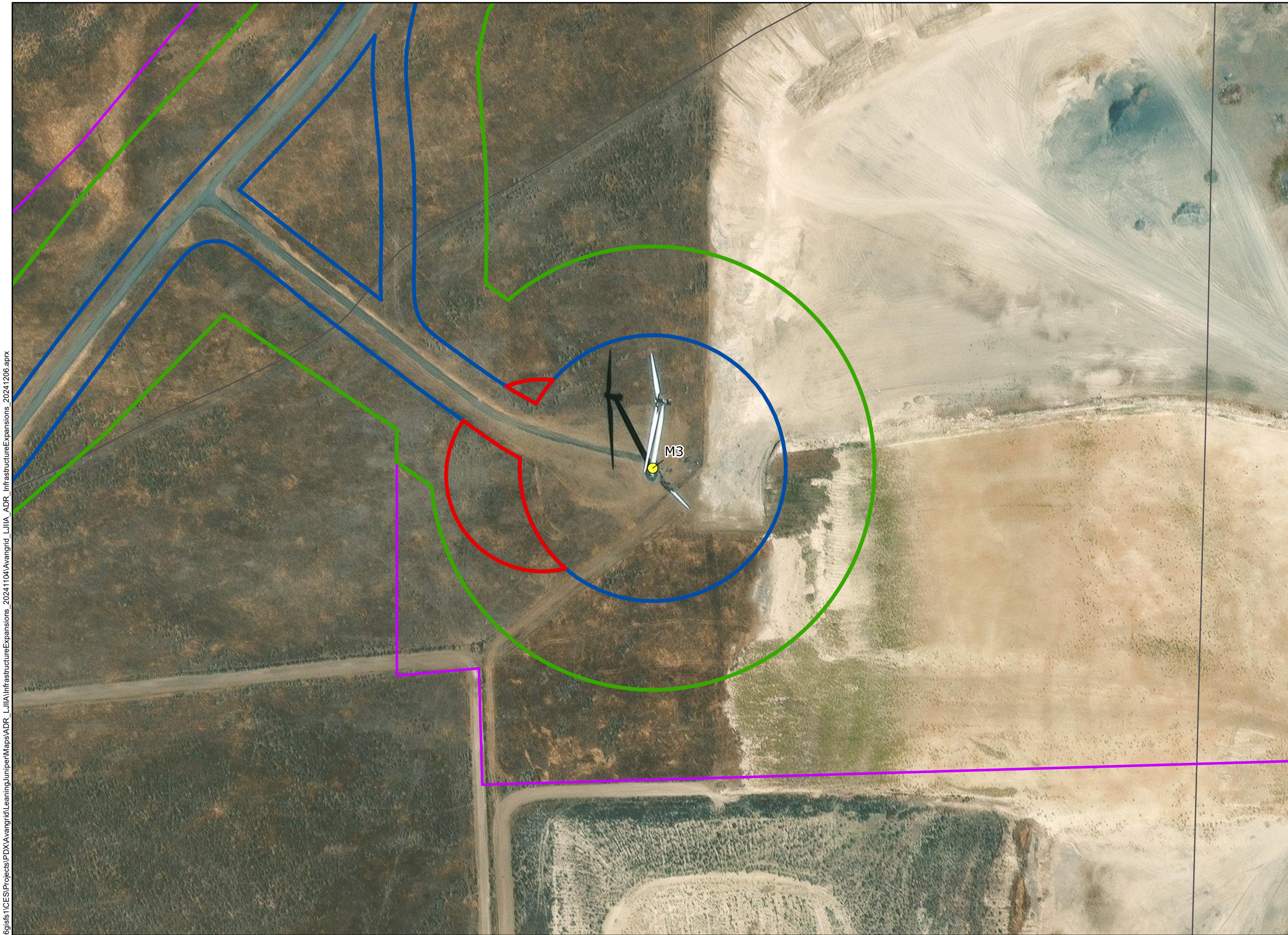
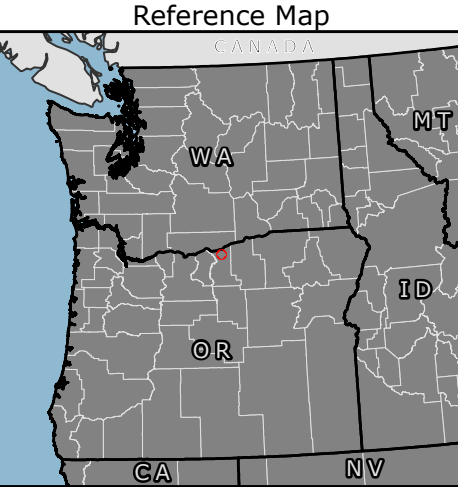


# Leaning Juniper IIA

## Figure 3 Expanded laydown area - Turbine M3

GILLIAM COUNTY, OR

- Site Boundary
- Repower Micrositing Corridor
- Original Estimated Temporary Disturbance Area
- Supplemental Work Zone
- Turbines
- Local Roads

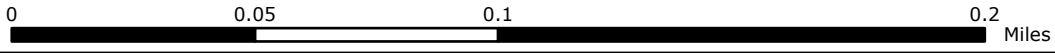


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WGS 1984 UTM Zone 10N



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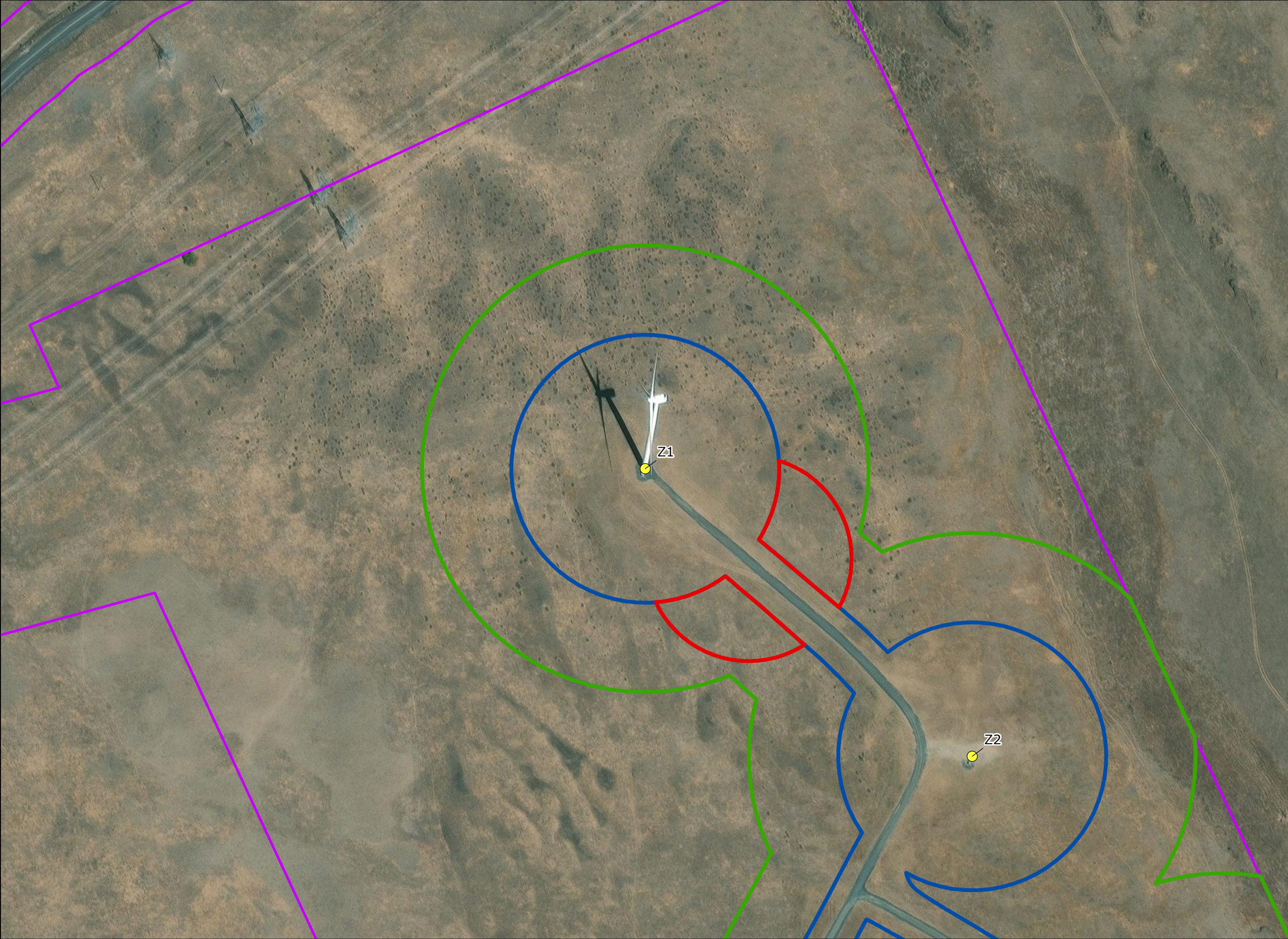
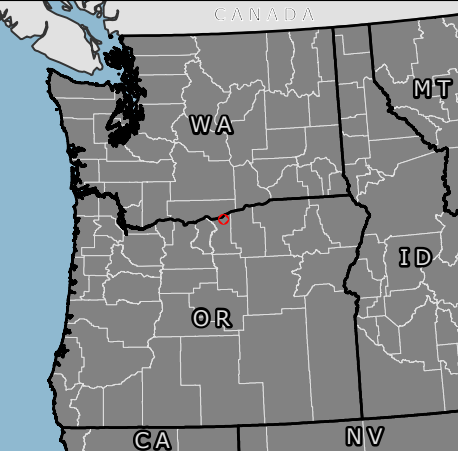
## Figure 4 Expanded laydown area – Turbine Z1

GILLIAM COUNTY, OR

- Site Boundary
- Repower Micrositing Corridor
- Original Estimated Temporary Disturbance Area
- Supplemental Work Zone
- Turbines
- Local Roads



Reference Map

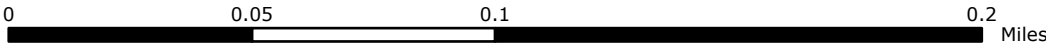


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# Leaning Juniper IIA

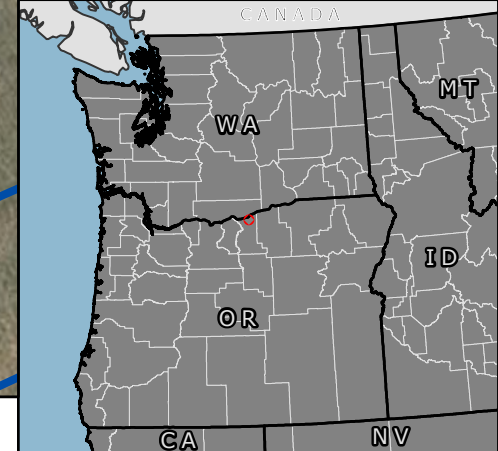
## Figure 5 LJIIA Operations and Maintenance Facility Storage Yard Expansion

GILLIAM COUNTY, OR

- Repower Micrositing Corridor
- Original Estimated Temporary Disturbance Area
- Laydown
- Approximate Layout of Storage Yard Expansion
- Local Roads



### Reference Map



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