Exhibit U

Availability of Public and Private Providers to Provide Services

Wheatridge Renewable Energy Facility East
January 2024

Prepared for
Wheatridge East Wind, LLC

Prepared by

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Acronyms and Abbreviations

ADT	average daily traffic
ASC	Application for Site Certificate
BESS	battery energy storage system
Certificate Holder	Wheatridge East Wind, LLC
Council	Energy Facility Siting Council
DoD	U.S. Department of Defense
ESCP	Erosion and Sediment Control Plan
FAA	Federal Aviation Administration
Facility	Wheatridge Renewable Energy Facility East
I-XX	Interstate
LOS	level of service
mph	miles per hour
MW	megawatts
NPDES	National Pollutant Discharge Elimination System
OAR	Oregon Administrative Rule
ODA	Oregon Department of Aviation
ODOT	Oregon Department of Transportation
O&M	operations and maintenance
OR-XX	Oregon State Highway
ORS	Oregon Revised Statutes
RFA	Request for Amendment
RV	recreational vehicle
TSP	Transportation System Plan
V/C	volume to capacity

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1.0 Introduction

The Wheatridge Renewable Energy Facility East (Facility) is an approved, but not yet constructed, wind energy generation facility consisting of up to 66 turbines and related or supporting facilities with a peak generating capacity of up to 200 megawatts (MW), to be located in an Approved Site Boundary of approximately 4,582 acres on over 42,000 acres of leased land in Morrow and Umatilla counties, Oregon. As part of Request for Amendment (RFA) 1 to the Facility Site Certificate, Wheatridge East Wind, LLC (Certificate Holder) is proposing to expand wind power generation at the Facility to provide the opportunity for increased power capacity and availability. This includes expanding the Site Boundary and micrositing corridors, increasing the peak generating capacity by adding more and newer turbines, changing the intraconnection routes, and extending the construction date. See the RFA 1's Division 27 document (*Request for Amendment #1 for the Wheatridge Renewable Energy Facility East*) for a more detailed summary of the proposed changes.

This Exhibit U was prepared to meet the submittal requirements in Oregon Administrative Rule (OAR) 345-021-0010(1)(u). Analysis in this exhibit incorporates and/or relies on reference information, analysis, and findings found in the Application for Site Certificate (ASC), previous RFAs, and Oregon Department of Energy Final Orders to demonstrate that the Facility, as modified by RFA 1, continues to comply with applicable Site Certificate conditions and the approval standard in OAR 345-022-0110.

2.0 Applicable Rules and Standards

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

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

To demonstrate compliance with this standard, and in accordance with OAR 345-021-0010(1)(u), Exhibit U must include information about significant potential adverse impacts resulting from the construction and operation of the Facility on the ability of public and private providers in the Analysis Area to provide the services listed in the standard.

3.0 Analysis Area

In accordance with OAR 345-001-0010(35)(b), the Analysis Area for public services is the area within and extending 10 miles from the site boundary (Figure U-1). The Amended Site Boundary is inclusive of portions of the Approved Site Boundary.

4.0 Analysis

4.1 Methods

Exhibit U presents an analysis of potential impacts on public service and demonstrates that the Facility will comply with the Public Services standard. It also provides updated information on providers and demographic information within the Analysis Area and demonstrates that there has been no significant change to area resources since the Site Certificate was issued. This exhibit analyses the maximum footprint within the wind micrositing corridors and Amended Site Boundary to address the worst-case impact.

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

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

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

The Certificate Holder's base assumptions discussed in this section pertain to or are associated with workforce needs of the Facility and are divided into two distinct phases for this Facility. The first is the construction phase, and the assumptions for this phase are discussed in Section 4.2.1. The second is the operations and maintenance (O&M) phase, and the assumptions of that phase are discussed in Section 4.2.2. As noted in Section 4.2.3, facility decommissioning would have similar impacts as construction, so there is no additional discussion of that phase.

The Certificate Holder anticipates that the Facility will be constructed in one, or potentially multiple phases; however, the phases are currently undefined. Potential phasing would be dependent upon the location and timing of construction of the Facility infrastructure and market demand. For the

purposes of demonstrating impacts to public and private services, the Certificate Holder presents the impact analysis as if the Facility would be constructed in a single phase lasting 12 months. This approach maximizes the average daily traffic count, the daily water use requirement, and the number of workers onsite at any given time. Phasing of Facility construction would spread the same impacts out over multiple construction periods, each with lesser impacts than if the Facility were to be built in a single phase.

4.2.1 Construction

During construction, an average of 240 workers would be present at the site, with an estimated maximum 360 workers onsite at one time, while multiple disciplines of contractors complete their work simultaneously during periods of the highest activity. Most construction workers would be employees of construction and equipment manufacturing companies under contract to the Certificate Holder.

Wind energy facility construction requires specialized skills; many workers move from project to project. Therefore, the Certificate Holder assumes that approximately 30 percent of the estimated construction workforce hired to work on the Facility would be hired locally (i.e., from Oregon), and the remaining 70 percent of the workforce would be from out of state and would temporarily relocate to the Facility. Very few, if any, of the out-of-state workers employed during the construction phase of the Facility would be expected to permanently relocate to the area. The percentage of the construction workforce that is hired locally would depend on the availability of workers with appropriate skills. The size of the skilled local workforce is continually growing as more wind farms are built in eastern Oregon, so the percentage of local construction workers may be higher than estimated.

Workers in some positions, such as construction foremen and inspectors, would be employed for the entire duration of the Facility, but many workers would be employed for 4 to 6 months and therefore would not be expected to bring families with them. The Certificate Holder assumes very few workers would relocate their families.

As the Certificate Holder assumes that because most construction workers would not be in the area for more than 6 to 12 months, housing for most construction workers would primarily be provided by hotels, motels, temporary housing, and recreational vehicle (RV) parks within a commutable distance to the Facility (30 miles).

4.2.2 Operations and Maintenance

An estimated 5 to 10 operational personnel would be permanently employed at the Facility at its full 300-MW capacity; this amount is in addition to the existing O&M staff currently employed at the operational Wheatridge Renewable Energy Facility I and II. The O&M staff would be hired locally, to the extent that skilled workers are available. Some outside contractors may also be required from time to time for specialized maintenance tasks, such as turbine inspections or the repair of nacelles or meteorological equipment. It is conservatively assumed that 50 percent (five) of these

employees are in-migrants with an average household size of three (higher than for temporary employees), up to 15 new permanent residents could be added to the local population. It is assumed that these workers will live locally. The Certificate Holder may also rely on O&M staff from its existing operating Wheatridge Facilities in Morrow County to provide operational support for the Facility. The Certificate Holder assumes that the Facility would be in operation for at least 50 years.

4.2.3 Retirement

If the Facility is retired (decommissioned), operational jobs will be eliminated. Retirement of the Facility will require removal of most Facility components and the restoration of disturbed areas (see Exhibits W and X). These activities will result in temporary decommissioning employment similar to the construction of the Facility. Decommissioning is estimated to require a similar duration as construction, i.e., up to 12 months.

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

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

4.3.1 Affected Counties, Cities, and Communities

Table U-1 presents historical population estimates for communities in Morrow and Umatilla Counties within the Analysis Area. Communities within 10 miles of the Facility were analyzed. Hermiston, located northeast of the Facility in Umatilla County, is the largest community in the Analysis Area. Hermiston had a 2020 population of approximately 19,354 people, 24 percent of Umatilla County's population total. Heppner, located approximately five miles southwest of the Facility, had the largest population in Morrow County. Heppner had a 2020 population of approximately 1,187 people, 9.7 percent of Morrow County's total population.

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

Location	Population			2000-2010		2010 -2020	
	Census 2000	Census 2010	Census 2020	Absolute Change	Percent Change	Absolute Change	Percent Change
OREGON	3,421,399	3,831,074	4,237,256	409,675	12.0	406,182	10.6
Morrow County	**10,995**	**11,173**	**12,186**	**178**	**1.6**	**1,013**	**9.1**
Heppner	1,392	1,291	1,187	-101	-7.3	-104	-8.1
Ione	328	329	337	1	0.3	8	2.4
Lexington	279	238	238	-41	-14.7	0	0
Umatilla County	**70,548**	**75,889**	**80,075**	**5,341**	**7.6**	**4,186**	**5.5**
Stanfield	1,971	2,043	2,144	72	3.7	101	4.9

Location	Population			2000-2010		2010 -2020	
	Census 2000	Census 2010	Census 2020	Absolute Change	Percent Change	Absolute Change	Percent Change
Hermiston	13,154	16,745	19,354	3,591	27.3	2,609	15.6
Echo	665	699	632	34	5.1	-67	-9.6
Source: U.S. Census Bureau 2000, U.S. Census Bureau 2010, U.S. Census Bureau 2020a.							

All communities within a commutable distance (30 miles) are considered in the housing analysis (see Sections 4.3.5 and 4.4.4). According to the most recent available U.S. Census Bureau (2015) residence to workplace data for 2011 to 2015, nearly 65 percent of Morrow County residents work within Morrow County (3,427 commuters per day). Morrow County receives 1,451 Umatilla County, Oregon commuters per day, 134 Benton County, Washington commuters per day, 61 Multnomah County, Oregon commuters per day, and 53 Lane County, Oregon commuters per day. The remaining 155 Morrow County commuters travel from multiple other, more distant counties. For Umatilla County, nearly 0.2 percent of Umatilla County residents work within Umatilla County (26,015 commuters per day), and the county receives 1,077 Morrow County, Oregon commuters per day, 1,010 Benton County, Washington commuters per day, 884 Walla Walla County, Washington commuters per day, 370 Franklin County, Washington commuters per day, and 163 Union County, Oregon commuters per day. The remaining 728 Morrow County commuters travel from multiple other, more distant counties.

4.3.2 Sewer and Water Services

In the rural area surrounding the proposed Facility, there are no developed sewer systems that would be impacted by construction or operation of the Facility. Sewage treatment in this rural area is limited to on-site septic systems. The nearest developed sewer system is located in the city of Heppner, approximately 5 miles from the Amended Site Boundary; other cities' sewer systems are farther away.

In the rural area surrounding the proposed Facility, there are no developed water systems that would be impacted by construction or operation of the Facility. Water sources in the Amended Site Boundary are limited to private landowners' wells. The nearest developed water systems are located in the cities of Lexington or Heppner, both approximately 5 miles from the Amended Site Boundary; other cities' water systems are farther away.

Approximately 42.9 million gallons of water would be needed during Facility construction, primarily for making concrete for wind turbine foundation construction and for dust control. As discussed in Exhibit O, potential sources include the cities of Boardman, Stanfield, Port of Morrow, and Hermiston or other nearby municipalities. Multiple sources may be used to obtain sufficient quantities of water.

Water use during operation of the Facility would be limited to small amounts used at the shared/existing O&M building for sanitation and human consumption. The Certificate Holder

expects to rely on the exempt well allowed under Oregon Revised Statutes (ORS) 537.545 which provides water to the shared/existing O&M building. The O&M building uses less than 5,000 gallons per day, which does not require the Certificate Holder to obtain a new water right.

4.3.3 Stormwater Drainage

In the rural area surrounding the proposed Facility, stormwater infrastructure is limited to minimal facilities associated with public roads maintained by Morrow or Umatilla counties. The nearest developed stormwater drainage facilities in the vicinity of the Facility are located within the limits of the cities of Heppner and Lexington; however, the Amended Site Boundary is approximately 5 miles from each city and the Facility would not connect to or otherwise impact either city's stormwater system.

4.3.4 Solid Waste Management

Both Morrow and Umatilla counties provide solid waste disposal and recycling services through franchise agreements with various private providers. Solid waste disposal for the Facility during construction and operations would be provided through a private contract with a local commercial hauler (or haulers) and is not anticipated to cause adverse impacts to services already being provided in the counties or nearby communities. The public landfill closest to the Facility Site Boundary is the Finley Buttes Regional Landfill, located approximately 10 miles south of Boardman, Oregon (see Attachment U-1 for record of correspondence).

Morrow County has adopted a Solid Waste Management Ordinance that addresses solid waste disposal and recycling in the County. One of the purposes of this ordinance is to "[provide] the opportunity to recycle as part of the overall solid waste plan," and refers in turn to Oregon's reuse and recycling requirements. The majority of the ordinance relates to licensing of waste disposal sites and waste collection franchises and recycling franchises. The ordinance obligates the waste and recycling franchisees to maintain records of amounts of waste collected or received, and amounts and types of waste recycled, consistent with reporting requirements of the Oregon Department of Environmental Quality. The Certificate Holder will continue to coordinate with waste and recycling franchisees servicing the Facility to maintain required records as needed for the ordinance (Conditions CON-PS-01 and OPR-PS-03).

4.3.5 Housing

Varying degrees of housing options are provided in incorporated and unincorporated communities within the Analysis Area, and within a commutable distance from the Facility (30 miles) outside of the Analysis Area. Typical housing options for temporary workers include hotels or motels, apartments, short-term rental homes, RV parks, and public or private campgrounds. Note that no RV usage is proposed at the Facility itself but rather at existing RV parks and campgrounds.

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

Some construction workers, particularly those employed for the entire duration of construction, may rent a house or apartment during construction of the Facility. Table U-2 presents housing supply and availability data for counties and communities within a commutable distance. The estimated number of vacant rental units is calculated as a percentage of total vacant housing units; that percentage is based on the ratio of renter-occupied dwellings to owner-occupied dwellings. Using this method, an estimated 800 housing units were available for rent in communities within a commutable distance. Housing vacancy rates for 2020 ranged from zero percent in several communities to 8 percent in Pilot Rock and Stanfield. The 2020 five-county average rental vacancy rate of approximately 5 percent is lower than the state of Oregon's rental vacancy rate of 7.8 percent. Six of the 14 communities experience vacancy rates greater than 5 percent.

Table U-2. Available Housing Estimates

Geographic Area	Total Housing Units (2020)	Vacant Housing Units (2020)	Of Occupied Housing, Percentage Occupied by Renter (2020)	Estimated Number of Vacant Rental Units (2020)	Rental Vacancy Percentage (2020)
OREGON	***1,813,747***	***141,764***	***37.2***	***52,736***	***3.6***
Umatilla County	**31,098**	**2,726**	**34.7**	**946**	**5.3**
Echo	243	28	48.4	14	0.0
Hermiston	6,500	459	38.5	177	4.1
Stanfield	974	59	23.8	14	8.0
Umatilla	2,027	97	37.9	37	0.0
Pilot Rock	550	45	20.6	9	8.0
Pendleton	6,673	913	45.8	418	7.0
Ukiah	171	54	27.4	15	0.0
Morrow County	**4,699**	**606**	**27.0**	**164**	**3.6**
Boardman	1,144	58	43.7	25	5.0
Heppner	684	128	39.0	50	6.9
Ione	207	29	29.8	9	0.0
Irrigon	731	63	19.6	12	0.0
Lexington	88	3	37.6	1	0.0
Gilliam County	**1,145**	**240**	**24.9**	**60**	**7.4**

Geographic Area	Total Housing Units (2020)	Vacant Housing Units (2020)	Of Occupied Housing, Percentage Occupied by Renter (2020)	Estimated Number of Vacant Rental Units (2020)	Rental Vacancy Percentage (2020)
Arlington	255	41	40.2	17	5.5
Lonerock	21	9	16.7	2	0.0
WASHINGTON	***3,150,194***	***244,372***	***36.7***	***89,685***	***3.7***
Benton County	**77,486**	**4,413**	**30.9**	**1,364**	**5.4**
Klickitat County	**10,626**	**1,358**	**29.3**	**398**	**3.3**
Source: U.S. Census Bureau 2020b.					

4.3.6 Transportation and Traffic Safety

The affected transportation service providers are the Oregon Department of Transportation (ODOT) for state highways, the Morrow County Road Department within the Public Works Department, and Umatilla County Public Works Road Department for other public roads.

4.3.6.1 Transportation Route

The construction of the Facility would result in a temporary increase in local traffic, including large trucks and construction equipment as well as construction workers' vehicles. Primary transportation corridors and a few major county roads would carry the majority of construction-related truck traffic and workforce traffic. The primary corridors are Interstate Highway 84 (I-84) and Oregon Highway 207 (OR-207). Also known as the Old Oregon Trail Number 6, I-84 serves as the primary east-west route through Morrow and Umatilla Counties. I-84 is a four-lane divided highway, with two lanes traveling in each direction and 6-foot paved shoulders. OR-207 is a two-lane undivided highway, and is classified as a regional highway and minor arterial road (Morrow County 2012). Some workforce traffic may also come from south of the Facility (e.g., Heppner), taking OR-74 to OR-207 then exiting onto either Bombing Range Road or Kilkenny Road to access the northwestern Amended Site Boundary; or exiting north onto Sand Hollow Road or Little Butter Creek Road to access the southern Amended Site Boundary. OR-74 is classified as a district highway and minor arterial road (Morrow County 2012).

County roads that would convey significant amounts of construction traffic include: Bombing Range Road (paved), Big Butter Creek Road (paved), Little Butter Creek Road (paved), Baseline Road (paved), Juniper Lane (paved), Strawberry Lane (graveled), Sand Hollow Road (paved), Myers Lane (paved), Kilkenny Road (paved), Myers Lane (paved), Spur Loop (paved) in Morrow County, and Eagle Ranch Road (graveled) in Umatilla County, most of which are classified and constructed as either Major Collector or Minor Collector roads; roads that are unclassified are Myers Lane, Spur

Loop, and Eagle Ranch Road (Morrow County 2012, Umatilla County 2002). Some other local and private roads may also see increases in traffic. Additional private access roads would be developed to each of the proposed wind turbines and associated facilities. The majority of Facility materials and equipment, including most turbine components and large construction equipment loads, would arrive at the Facility via I-84 and OR-207. Bombing Range Road would be used for large component or equipment deliveries to the western portion of the Amended Site Boundary, and would also be used for other truck traffic including deliveries of aggregate, water, and other construction materials. Figure U-2 identifies the primary construction transportation routes to the Facility.

4.3.6.2 Traffic Volumes

Table U-3 provides updated traffic volumes for the expected state highway transportation routes. State highway volumes were published in the 2017 through 2021 Traffic Volume Tables (ODOT 2017, ODOT 2018a, ODOT 2019, ODOT 2020, ODOT 2021a). Table U-3 shows the average daily traffic (ADT) volumes for the most recent 5 years of data available at various milepost locations along the state highway transportation routes.

Table U-3 shows that from 2017 to 2021, ADT volumes increased by approximately 11.3 percent on average for I-84, 19.9 percent on average for OR-207, and 19.1 percent on average for OR-74. OR-207 and OR-74, which generally carry much lower volumes than I-84 (1,602 and 1,594 average trips per day, respectively, compared to 18,074 average trips per day on I-84, as of 2021), saw an increase of 266 and 323 average trips per day, respectively, between 2017 and 2021. I-84 saw an increase of 1,836 average trips per day between 2017 and 2021.

Due to the rural nature of the Analysis Area, recent traffic counts for county roads that are proposed as transportation routes are not available. Neither county monitor traffic volumes on a yearly basis. The most recent version of the Morrow County Transportation System Plan (TSP; Morrow County 2012) indicates that the County only has one year of traffic-count data (2005) for a select group of roadway segments in the County. Traffic data in the TSP indicate that Bombing Range Road had an ADT of 1,250 in 2005, one of the highest counts of the roads included in the analysis (Morrow County 2012); no other ADT values were provided for the remaining county roads proposed as transportation routes. However, in general, traffic volumes on Morrow County roadways are low. Existing volume-to-capacity ratios are low for county roads, and thus it is assumed that existing capacity deficiencies on any county roadways are unlikely (Morrow County 2012). The Umatilla County TSP refers to the ODOT traffic count data (Umatilla County 2002). County roadway volumes are minimal, with some increase during the summer and early fall for harvest of various crops in the area.

Table U-3. Transportation Route Average Daily Traffic Volumes

Highway[1]	Location	Milepost	2017	2018	2019	2020	2021	Percent Change 2017-2021
I-84								**+11.3**
I-84 (No. 6)	Boardman Jct. Automatic Traffic Recorder, Sta. 25-008, 0.60 mile southeast of Columbia River Highway No. 2 Interchange (US 730)	168.55	17,000	17,700	17,900	16,781	19,389	+14.1
I-84 (No. 6)	0.40 miles east of Paterson Ferry Interchange	171.53	17,400	18,200	18,400	17,237	19,796	+13.8
I-84 (No. 6)	0.30 miles east of Ordnance Interchange	178.28	18,100	19,000	19,100	17,982	20,451	+13.0
I-84 (No. 6)	0.60 miles east of McNary Interchange (I-82)	180.05	15,400	16,100	16,200	15,168	16,459	+6.9
I-84 (No. 6)	0.30 miles east of Westland Interchange	180.71	15,400	16,100	16,100	15,143	16,432	+6.7
I-84 (No. 6)	0.30 miles east of Hermiston Highway Interchange (OR207)	183.16	13,400	14,000	14,000	13,117	14,529	+8.4
I-84 (No. 6)	2.56 miles east of Umatilla-Stanfield Highway No. 54 Interchange	191.40	16,500	17,300	17,300	16,310	18,720	+13.4
I-84 (No. 6)	0.30 miles east of Lexington-Echo Highway Interchange	193.83	16,700	17,400	17,400	16,408	18,815	+12.7
OR-207								**+19.9**
OR-207 (No. 333)	0.08 miles north of Old Oregon Trail (I-84)	12.42	7,300	7,000	7,000	None	7,729	+5.9
OR-207 (No. 333)	0.10 miles south of Old Oregon Trail (I-84)	12.60	1,500	1,700	1,700	None	2,101	+40.1
OR-207 (No. 333)	0.10 miles north of Lexington-Echo Highway	17.71	1,400	1,500	1,500	1,429	1,531	+9.4

Highway[1]	Location	Milepost	2017	2018	2019	2020	2021	Percent Change 2017-2021
OR-207 (No. 320)	0.05 miles east of Hermiston Highway (OR207)	27.29	380	320	320	310	365	-4.0
OR-207 (No. 320)	0.05 miles south of Hermiston Highway (OR207)	27.19	1,000	1,100	1,100	1,059	1,464	+46.4
OR-207 (No. 320)	0.13 miles west of Gordon Creek Road	19.89	910	1,000	1,000	972	1,346	+47.9
OR-207 (No. 320)	On Butter Creek Bridge	19.48	850	860	850	830	1,113	+30.9
OR-207 (No. 320)	0.10 miles southwest of Grieb Lane	13.62	790	850	850	822	995	+25.9
OR-207 (No. 320)	0.02 miles northeast of Kilkenney Road	10.15	730	790	780	762	935	+28.1
OR-207 (No. 320)	0.02 miles north of Turner Lane	3.89	780	870	870	842	986	+26.4
OR-207 (No. 320)	0.11 miles east of Lexington Grange Road	2.48	790	880	870	850	1,005	+27.2
OR-207 (No. 320)	0.02 miles south of Lexington Grange Road	2.35	840	940	940	909	1,058	+26.0
OR-207 (No. 320)	North city limits of Lexington	0.25	910	1,000	1,000	991	1,072	+17.8
OR-207 (No. 320)	0.02 miles northeast of East Street	0.08	870	1,000	990	959	1,122	+29.0
OR-207 (No. 320)	0.02 miles northeast of Heppner Highway (OR74)	0.02	990	1,100	1,000	1,019	1,206	+21.8
OR-74								**+19.1**
OR-74 (No. 52)	0.02 miles northwest of Lexington-Echo Highway (OR207)	36.40	840	920	910	884	1024	+21.9

Highway[1]	Location	Milepost	2017	2018	2019	2020	2021	Percent Change 2017-2021
OR-74 (No. 52)	0.02 miles southeast of Lexington-Echo Highway (OR207)	36.47	1,300	1,500	1,500	1,482	1680	+29.2
OR-74 (No. 52)	0.02 miles southeast of "C" Street	36.62	1,300	1,400	1,400	1,317	1614	+24.2
OR-74 (No. 52)	Lexington Automatic Traffic Recorder, Sta. 25-007, 1.38 miles southeast of Lexington-Echo Highway No. 320 (OR207)	37.83	1,400	1,400	1,400	1,444	1450	+3.6
OR-74 (No. 52)	0.02 miles southeast of Bunker Hill Lane	41.58	1,300	1,400	1,400	1,318	1622	+24.8
OR-74 (No. 52)	0.02 miles northwest of Dee Cox Road	44.27	1,500	1,500	None	None	None	N/A
OR-74 (No. 52)	0.07 miles northwest of Fuller Canyon Road	44.70	1,600	1,600	1,600	1,535	1912	+19.5
OR-74 (No. 52)	North city limits of Heppner	45.00	1,500	1,400	1,400	1,374	1886	+25.7
OR-74 (No. 52)	0.02 miles north of Quaid Street	45.52	2,000	2,100	2,100	2,023	3094	+54.7
OR-74 (No. 52)	0.02 miles south of Quaid Street	45.56	2,000	2,000	2,000	1,941	3037	+51.2
OR-74 (No. 52)	0.02 miles north of Center Street	45.72	2,300	2,300	2,300	2,261	3428	+49.0
OR-74 (No. 52)	0.02 miles south of Center Street	45.76	2,300	2,300	2,300	2,252	2928	+27.3
OR-74 (No. 52)	0.02 miles north of Wasco-Heppner Highway (OR206/OR207)	45.87	2,100	2,000	2,000	1,966	2704	+28.8
OR-74 (No. 52)	0.02 miles east of Wasco-Heppner Highway (OR206/OR207)	45.91	1,800	1,700	1,700	1,613	1876	+4.2

Highway[1]	Location	Milepost	2017	2018	2019	2020	2021	Percent Change 2017-2021
OR-74 (No. 52)	0.2 miles north of May Street	46.04	1,100	900	890	862	968	-12.0
OR-74 (No. 52)	At east city limits of Heppner	46.34	530	470	460	448	438	-17.4
OR-74 (No. 52)	0.02 miles west of Sand Hollow Road	49.43	220	240	240	233	292	+32.7
OR-74 (No. 52)	0.05 miles east of Sand Hollow Road	49.50	150	140	140	136	182	+21.3
OR-74 (No. 52)	0.02 miles east of Hanna Arbuckle Road	53.93	90	110	110	104	113	+25.6
OR-74 (No. 52)	0.02 miles east of Little Butter Creek Road	62.10	90	50	50	45	27	-70.0

Source: ODOT 2017, ODOT 2018a, ODOT 2019, ODOT 2020, ODOT 2021a.

1. The number in parenthesis is the internal ODOT number designation for each state highway.

4.3.6.3 Pavement Conditions

Pavement conditions can influence traffic safety issues. Poor pavement with potholes might cause vehicles to swerve, resulting in unsafe vehicle operation. ODOT's 2020 Pavement Condition data were reviewed for state highway transportation routes (ODOT 2021b). Table U-4 shows the conditions for state highways anticipated to be used as part of the primary construction transportation routes.

Table U-4. Pavement Condition for State Highway Transportation Routes

Roadway	Approximate Milepost	Pavement Condition
I-84 (No. 6)	MP 163.50 to 167.58	Good
I-84 (No. 6)	MP 167.58 to 180.00	Good
I-84 (No. 6)	MP 180.00 to 184.60	Fair
I-84 (No. 6)	MP 184.6 to 188.04	Under Construction
OR-207 (No. 333)	MP 12.59 to 17.81	Fair
OR-207 (No. 320)	MP 0.00 to 10.15	Good
OR-207 (No. 320)	MP 10.15 to 19.53	Good
OR-207 (No. 320)	MP 19.53 to 27.24	Fair
OR-74 (No. 52)	MP 36.45 to 38.82	Good
OR-74 (No. 52)	MP 38.82 to 45.38	Good
OR-74 (No. 52)	MP 45.38 to 45.89	Good
OR-74 (No. 52)	MP 45.89 to 46.48	Good
OR-74 (No. 52)	MP 46.48 to 55.81	Good
OR-74 (No. 52)	MP 55.81 to 62.04	Good
OR-74 (No. 52)	MP 62.04 to 66.00	Good
Source: ODOT 2021b.		

The majority of the state highway transportation routes are in good condition. There is one segment of I-84 (MP 180.00 to 184.60) and two segments of OR-207 (MP 12.59 to 17.81 and MP 19.53 to 27.24) that have fair ratings. A fair rating indicates minor or low severity pavement deficiencies that typically lead to treatment such as chip seal or light resurfacing (ODOT 2021b); however, fair conditions do not indicate a safety hazard. Additionally, one segment of I-84 (MP 184.6 to 188.04) is rated as under construction. "Under Construction" sections of state highways are included in the "good" pavement condition category and are identified during the paving season which spans from late May to September; this section of road was identified in September 2020 (ODOT 2021). It is recommended that this section of road be reevaluated through consultation with ODOT prior to Facility construction.

Local county roadways are either paved or graveled with most of the identified local roads being paved, with the exception of Strawberry Lane and Eagle Ranch Road which are graveled.

4.3.6.4 Performance Standards and Existing Traffic

A significant adverse impact in terms of transportation would result if construction or operation of the Facility would meaningfully lower the level of service (LOS) provided to the public. That could occur if additional traffic generated by the Facility were to exceed the capacity of existing roads, resulting in significant and ongoing delays in travel times or unmitigated damage to roads.

Transportation engineers have established various standards for measuring traffic capacity of roadways or intersections. Each standard is associated with a particular LOS. The LOS concept requires consideration of factors that include travel speed, delay, frequency of interruptions in traffic flow, relative freedom for traffic maneuvers, driving comfort and convenience, and operating cost.

In the Oregon Highway Plan (ODOT 2018b), LOS were defined by a letter grade from A-F, with each grade representing a range of volume to capacity (V/C) ratios. A V/C ratio is the peak hour traffic volume on a highway divided by the maximum volume that the highway can handle. If traffic volume entering a highway section exceeds the section's capacity, then disruptions in traffic flow will occur, reducing the LOS. LOS A represents relatively free-flowing traffic and LOS F represents conditions where the road system is totally saturated with traffic and movement is very difficult.

The Oregon Highway Plan guides state highway development and management for a 20-year planning horizon. In this plan, ODOT identified the performance standards in terms of V/C for state highways. Table U-5 lists applicable maximum V/C for peak hour operating conditions from the Oregon Highway Plan (ODOT 2018b). No reductions in LOS on state roads that would be used or impacted by the Facility are anticipated.

Table U-5. ODOT Maximum Volume-to-Capacity Ratios for Peak Hour Operating Conditions

Highway Category	Inside Urban Growth Boundary[1]	Unincorporated Communities	Rural Lands
Interstate Highways (I-84)	0.80 to 0.85	0.70	0.70
Regional Highways (OR-207)	0.85 to 0.95	0.75	0.70
District/Local Interest Roads (OR-74)	0.90 to 0.95	0.80	0.75

Source: ODOT 2018b.

1. The primary transportation routes to the Facility are not located within any Urban Growth Boundary.

Performance standards for Morrow County roads are defined in the 2012 Morrow County TSP (Morrow County 2012). The Morrow County TSP discusses capacity in terms of LOS and calls for a minimum LOS C in rural areas and LOS D for the areas surrounding cities within urban growth boundaries.

The Morrow County TSP also provides information on existing and projected future traffic volumes and LOS. Based on existing traffic data, the state highways and county roads in Morrow County are operating well below maximum acceptable V/C ratios. Existing daily volumes on the state facilities in 2009 (the most recent reported in the Morrow County TSP; Morrow County 2012) range from

15,000 ADT on I-84 west of Port of Morrow interchange to 60 ADT on OR-206 at the Morrow-Gilliam County Line. A majority of the state highways in the county carried less than 1,000 ADT in 2009. Traffic data from 2004 indicates that all state highways operated well within capacity, with a maximum V/C of 0.40 for I-84 at the Port of Morrow interchange; OR-207 operated at a V/C of 0.01 to 0.05; OR-74 operated at a V/C of 0.01 to 0.02. Over the next 20 years, only one highway segment is expected to exceed a V/C of 0.50 (I-84, east of Paterson Ferry Road), but it would still operate within acceptable levels. This road would not be used for Facility traffic.

Traffic data is provided for only a few of the busiest county roads, and of those roads only Bombing Range Road is likely to be used by Facility traffic. Bombing Range Road carries an average of 1,250 vehicles per day; it operates at an estimated V/C ratio of below 0.10, or LOS A. Existing estimated V/C for the four busiest county roads are low, with a maximum of 0.24. Rural access roads are low volume, usually carrying less than 200 vehicles per day. Although traffic count data is limited, the County assumes that with such low V/C on the county roads known to carry the highest traffic volumes (none of which would be used for access to the Facility), existing capacity deficiencies on any county roadways are unlikely. Current data indicates that all intersections in Boardman and Heppner operate in an acceptable LOS A or B. The County assumes that, since traffic volumes in the cities are generally higher than rural areas, intersection operations in the rural areas are also acceptable. Low to modest growth rates in population and resulting traffic are anticipated in the rural areas over the 20-year planning horizon. Consequently, no reductions in LOS on Morrow County roads that would be used or impacted by the Facility are anticipated.

Performance standards for Umatilla County roads are defined in the 2002 Umatilla County TSP (Umatilla County 2002). The Umatilla County TSP discusses roadway capacity in terms of both LOS and V/C and provides a useful comparison between the two for both freeways and two-lane highways; this comparison is presented in Table U-6, along with a description of typical traffic flow conditions for two-lane highways. The TSP includes a goal to "Preserve the function, capacity, LOS, and safety of the local streets, county roads, and state highways"; however, a minimum LOS is not specified in the TSP.

Table U-6. LOS to V/C Equivalencies

LOS	Equivalent V/C	Typical Traffic Flow Conditions for Two-Land Highways
A	0.00 to 0.48	Motorists are able to drive at their desired speed which, without strict enforcement, would result in average speeds approaching 60 miles per hour (mph). Passing demand is well below passing capacity, and almost no platoons of three or more vehicles are observed.
B	0.49 to 0.59	Speeds of 55 mph or slightly higher are expected on level terrain. Passing demand needed to maintain desired speeds becomes significant and approximately equals the passing capacity.
C	0.60 to 0.69	Further increases in flow result in noticeable increases in platoon formation, platoon size, and frequency of passing impediment. Average speed still exceeds 52 mph on level terrain, even though unrestricted passing demand exceeds passing capacity. While traffic flow is stable, it is becoming susceptible to congestion due to turning traffic and slow-moving vehicles.

LOS	Equivalent V/C	Typical Traffic Flow Conditions for Two-Land Highways
C-D	0.70 to 0.73	-
D	0.74 to 0.83	Unstable traffic flow as passing demand is very high. Average platoon sizes of 5 to 10 vehicles are common, although speeds of 50 mph can still be maintained under ideal conditions. This is the highest flow rate that can be maintained for any length of time over an extended section of level terrain without a high probability of breakdown.
D-E	0.84 to 0.87	-
E	0.88 to 0.97	Under ideal conditions, speeds will drop below 50 mph. Average travel speeds on highways with less than ideal conditions will be slower, as low as 25 mph on sustained upgrades. Passing is virtually impossible and platooning becomes intense when slower vehicles or other interruptions are encountered.
E-F	0.98 to 0.99	-
F	1.00	Heavily congested flow with traffic demand exceeding capacity.
Source: 2002 Umatilla County TSP.		

As of 2002, all rural segments of freeways in Umatilla County operate at LOS A or better during average conditions and LOS B or better during peak summer conditions. All but one segment (on US 730, a road that would not carry Facility traffic) of rural two-lane highways in Umatilla County operate at LOS C or better. ADT volumes along most local roads are less than 500. Collector roads are intended to carry between 1,200 and 10,000 ADT, and the TSP reports that most of these carry below 1,000 ADT (Umatilla County 2002). As assessed at the time of the TSP, all roads used for access to the Facility operated at LOS A (<0.48 V/C). Access to and from "highly important" roads at intersecting minor roads is also adequate, reaching an estimated LOS B, where peak hour minor road traffic volumes reach up to 150 vehicles per hour. Consequently, no reductions in LOS on Umatilla County roads that would be used or impacted by the Facility are anticipated.

4.3.6.5 Air Transportation

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

- West Buttercreek Airport, located 2.1 miles N of the Amended Site Boundary (private);
- Lexington Airport, located 5.2 miles SW of the Amended Site Boundary (public);
- K2 Airport, located 6.0 miles N of the Amended Site Boundary (private); and
- Hermiston Municipal Airport, located 9.9 miles N of the Amended Site Boundary (public).

Federal Aviation Administration (FAA) notification will occur as previously approved by Condition PRE-PS-04, which requires that before beginning construction, the Certificate Holder will submit FAA form 7460-1 to the FAA and the Oregon Department of Aviation (ODA) in accordance with ORS 836.535(2)(a) requesting a determination of No Hazard in order to allow the agency to evaluate the effect of the proposed construction on air safety and navigable airspace. The FAA evaluation begins

with a determination of whether the proposed structure represents an obstruction. Obstructions are defined in 14 Code of Federal Regulations 77, Subpart C (Sections 77.13 through 77.23), which defines obstructions based on both absolute height of the proposed object and height in relation to protected airspace. Thresholds for notifying the FAA are defined in 14 Code of Federal Regulations Subpart B Section 77.9 and are related to construction that would represent an obstruction or would intrude upon protected airspace or approach and takeoff clearance areas around airports. The first threshold for notice is any construction or alteration that would exceed 200 feet above ground level. The second threshold for notice is construction that would exceed the height of an imaginary surface extending upward and outward for a horizontal distance of 20,000 feet (3.8 miles) from an airport runway. For the purposes of notification and hazard determination, an airport is defined by the FAA as a public use airport, a military airport, an airport operated by a federal agency or the Department of Defense (DoD), or an airport with an FAA-approved Instrument Approach Procedure.

Following the submittal of the Facility's notice to the FAA and ODA, if required, the agency will conduct an aeronautical study in coordination with the U.S. Department of Defense (DoD) "clearing house" process. The DoD conducts formal reviews of projects for which the FAA conducts aeronautical analyses. The DoD provides information regarding FAA analyses to potentially affected military departments and DoD components, and reports back to FAA and the project proponents if unacceptable impacts to national security could occur as a result of implementation of a project. Proponents then have the opportunity to explore potential mitigation options that ensure continued DoD operations, testing, and training as well as energy development.[1]

A Determination of No Hazard to Air Navigation will be issued when the aeronautical study concludes that the proposed construction or alteration will exceed an obstruction standard but will not have a substantial aeronautical impact to air navigation. A Determination of No Hazard to Air Navigation may include conditional provisions, limitations to minimize potential problems, supplemental notice requirements, or requirements for marking and lighting, as appropriate. The Certificate Holder will provide a record of all correspondence with FAA and ODA to the Council no less than 30 days prior to construction.

4.3.7 Fire Protection

Fire protection service in the Analysis Area is provided by a number of agencies including the Boardman Rural Fire Protection District, the Ione Rural Fire Protection District, the Heppner Volunteer Fire Department, and the Echo Rural Fire Protection District. The Certificate Holder will provide to all involved fire departments construction plans, phasing information, and locational

[1] The DoD Siting Clearinghouse acts as a single point of contact for Federal agencies; State, Indian tribal, and local governments; developers; and landowners, and provides a central forum for internal staffing. This website is a central location to provide information and act as a resource to assist interested individuals and organizations understand the mission impacts of proposed energy projects near military activities, and the Department's MCE process, procedures, and mitigation opportunities. The Clearing House process is defined in Part 211 of Title 32 of the Code of Federal Regulations.

information for all Facility infrastructure, including Facility access. Attachments U-2 through U-5 are a record of correspondence with the Heppner Volunteer Fire Department, Ione Rural Fire Protection District, Echo Rural Fire Protection District, and Boardman Rural Fire Protection District confirming that the construction and operation of the Facility would not impede their abilities to provide emergency services. As the Facility is outside the boundaries of the city of Lexington and is completely within the rural fire protection districts of Heppner, Ione, and Echo, any emergency fire response would be by one of these three rural fire protection districts and any assistance by another fire department would be in the service of one of these three rural fire protection districts.

4.3.8 Law Enforcement

Police service in the Analysis Area is primarily provided by county police departments; some of the cities in the Analysis Area have a city police department that operates within their respective cities but would not cover the Facility Amended Site Boundary. As necessary, the Certificate Holder will seek assistance from the nearest Morrow County Sheriff's Office, located in Heppner, Oregon, or from the nearest Umatilla County Sheriff's Office, located in Stanfield, Oregon (see Attachments U-6 and U-7). Additional law enforcement service is available through the Oregon State Police, with offices in Arlington, Heppner, Hermiston, and Pendleton. The small number of temporary construction workers and additional permanent-resident employees is not anticipated to place significant new demands on law enforcement agencies in the area.

4.3.9 Health Care

There are a number of health care service providers in the Analysis Area. The nearest hospitals are the Pioneer Memorial Hospital located in Heppner and the Good Shepherd Medical Center in Hermiston. The nearest Level III trauma center is the Mid-Columbia Medical Center in The Dalles (Oregon Rural Health Association 2022). Ambulance service in the area is provided by the Morrow County Health District's Emergency Medical Services and the Hermiston Fire and Emergency Services (Oregon Licensed Ambulance Service Providers 2019). Some of the nearby fire districts also have First Response Vehicles, with equipment and crew trained to stabilize a patient until the arrival of an ambulance for transport. In the event of a serious injury during construction or operation of the Facility, the patient may be flown by helicopter (operated by Life Flight) to one of the two Level 1 hospitals located in Portland: Oregon Health & Science University Hospital or Legacy Emmanuel Medical Center.

4.3.10 Schools

The Facility Amended Site Boundary falls within two school districts: Morrow County School District No 1 and Echo School District No. 5 in Umatilla County. The schools closest to the Facility are Echo High School and the Ione High School, located 6 miles and 11 miles from the Facility's northeast and southwest Amended Site Boundary, respectively. Other nearby school districts (most of which are outside of the 10-mile Analysis Area) that may experience an increase in enrollment

due to the Project include: the Hermiston, Stanfield, and Pendleton school districts in Umatilla County, the Ione School District in Morrow County, and the Richland, Kennewick, Prosser, Kiona-Benton City, and Finley school districts in Benton County, Washington.

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

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

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

The Facility is not expected to have any significant adverse impact on any public or private service providers in the Analysis Area, either during the construction phase or the O&M phase. Construction workers will be dispersed throughout the construction area, and would generally stay in a single location for a period from a few weeks to as long as 12 months.

4.4.1 Sewer and Water Services

The Facility will not have an adverse impact to water or sewer services because in the rural area in which the Facility is proposed, there are no developed water or sewer systems that would be impacted by construction or operation of the Facility. The nearest developed water and sewer systems are located in the cities of Lexington or Heppner, both approximately 5 miles from the Amended Site Boundary; other cities' water and sewer systems are farther away. During construction, sanitary waste will be collected on-site in portable toilets, to be provided and maintained by a licensed subcontractor. During operations, sanitary waste will be limited to domestic wastewater from the Facility's shared/existing O&M building, which will be discharged to a licensed on-site septic system (Condition OPR-PS-01). Due to the distance to the nearest developed sewer system, the Certificate Holder does not anticipate that connection to sewers or sewage treatment facilities would be required. Therefore, impacts to community sewer systems are not anticipated.

Because water for construction will only be obtained from permitted municipal sources with adequate water rights, public water systems will not be adversely affected by construction of the Facility. The Certificate Holder does not anticipate that groundwater or surface water sources or limited licenses would be needed. The Public Works Departments of Boardman, Stanfield, and Hermiston, as well as the Port of Morrow, have provided written correspondence (see Exhibit O Attachments) that adequate water is available for the construction of the Facility. Construction of the Facility is highly unlikely to affect the small number of wells in the Analysis Area.

Water use during operations would be limited and supplied through an exempt well located at the shared/existing O&M building (Condition OPR-PS-02). The limited amount of water that can be

used from the existing exempt well is not expected to result in injury to other private water rights in the vicinity of the Facility.

4.4.2 Stormwater Drainage

The Facility will not have an adverse impact on the provision of stormwater drainage services because construction, operation and decommissioning would not require construction or expansion of public stormwater drainage facilities. The Facility is located sufficiently far from existing municipal stormwater drainage facilities that there would be no impacts to those facilities.

Construction of the proposed Facility will add new impervious surfaces to a small fraction of the total Facility site acreage. Stormwater runoff generated in areas disturbed by Facility construction will continue to be managed onsite through implementation of best management practices, typically through the use of retention and infiltration systems as described in the Facility's National Pollutant Discharge Elimination System (NPDES) 1200-C construction permit and accompanying Erosion and Sediment Control Plan (ESCP). In accordance with Condition CON-SP-01, these will be completed prior to construction. Most of the Facility site is vegetated, which will serve as a buffer to promote infiltration and minimize erosion.

Stormwater management infrastructure put in place to manage stormwater during construction will, as needed, be left in place to continue functioning throughout the life of the Facility. Such features may include roadside ditches, infiltration swales or retention basins. All of these facilities will be located on private land and will not affect the provision of stormwater management services by any public agency.

The Facility would comply with federal, state, and local statutes and regulations related to stormwater runoff including the NPDES 1200C permit, which will be completed prior to construction, and the associated ESCP (see Exhibit I for further details). Construction Best Management Practices associated with these permits are expected to reduce any stormwater impacts below significant levels.

4.4.3 Solid Waste Management

Construction and operation of the Facility will not have an adverse impact on solid waste management. Facility construction will generate a variety of solid wastes, including concrete, scrap metal, and wood and plastics used to secure and protect components during shipping. The Certificate Holder will continue to implement best management practices for disposal and recycling (per Conditions PRE-WM-01, CON-PS-01, GEN-OE-04, and OPR-PS-03), by collecting all waste in a central location during construction, to be hauled away by a licensed waste disposal service as required by Condition CON-PS-01. Excess soil from road construction and foundation excavation will be spread on site to the extent practicable, or hauled off-site to be disposed of in accordance with applicable regulations (CON-WM-01). O&M of the Facility would employ up to 10 people, which would result in little generation of solid waste. Exhibit W includes detailed information about types and quantities of solid waste and disposal.

The Certificate Holder will recycle wastes to the extent practicable, and will contract with a local franchise waste hauler to remove both recyclables and solid waste from the Facility area. As mandated by Morrow County's Solid Waste Management Ordinance, the Certificate Holder will coordinate with waste and recycling franchisees servicing the Facility to maintain required records (Condition GEN-PS-01). Solid wastes are anticipated to be disposed at the Finley Butte Landfill, which has adequate capacity to serve the Facility. Correspondence with Jocelyn Jones, Business Developer at Finley Butte Landfill, confirms that Finley Butte will be able to accommodate the construction waste generated by Facility construction and operation (Attachment U-1)

4.4.4 Housing

Potential impacts on housing could result if there were an inadequate supply of housing in relation to the demand from the new temporary and permanent residents associated with the Facility. It is not yet known where the new temporary and permanent residents will settle and what type of housing they will select.

The number of skilled local workforce is continuously growing as more wind energy projects are built in eastern Oregon. As discussed below, additional workers are likely to commute daily from communities outside the Analysis Area (e.g., Echo, Hermiston, Stanfield, Umatilla, Pilot Rock Pendleton, Ukiah, Boardman, Heppner, Ione, Irrigon, Lexington, Arlington, and Lonerock), which would lessen impacts to housing associated with the in-migration of outside workers.

Based on the projected Facility employment and population amounts, additional temporary housing could be required for up to 108 new households during the peak construction period and about 72 new households on average during the 12-month construction period. However, this is based on the conservative assumption that 30 percent of construction workers will be hired locally—and thus not require temporary housing—while the remainder would be from outside the 30-mile commuting distance. Additionally, it is assumed that most construction workers will be in the area for approximately 6 months as opposed to the full construction period. The actual number of temporary residents may be fewer if more locals are hired. In addition, while the household estimates assume the entire Facility would be constructed in one period, construction of the Facility may take place over multiple phases. Thus, any Facility-related housing demand would be less than the maximum estimates provided.

Hotels, motels, and trailer or RV parks will likely be the most viable available housing option for temporary residents. Publicly available hotel and motel occupancy data show an estimated statewide year-to-date occupancy rate of 62.8 percent in July from 2022 (Travel Oregon 2022a). Hotel and motel occupancy rates also vary by region, with occupancy rates in Oregon generally higher in the Portland Metro area. Based on desktop sources, more than 2,206 hotel and motel rooms and 391 RV spaces in communities within a commutable distance (30 miles) to the Facility are available (Travel Oregon 2022b; Tripadvisor.com 2022). Some hotels and lodges are available in Heppner (4.8 miles away), Hermiston (10.3), Umatilla (16.2 miles away), Boardman (19.1 miles away), Pendleton (21.1 miles away), Ukiah (24.5 miles away), and Arlington (30.0 miles away). The communities listed above as well as Echo (5.7 miles away), Stanfield (7.3 miles away), and Irrigon

(17.0 miles away), also have campground and RV park options available (Travel Oregon 2022b; Tripadvisor.com 2022). Most rooms were found in Pendleton, Boardman and Hermiston. Additional rooms may be available in establishments that do not have information available online. Additional temporary housing will be available in overnight facilities located at private RV campgrounds or private, long-term rentals offered through companies like Airbnb. Consultation with cities will occur as necessary regarding temporary housing options prior to construction. Note that no RV usage is proposed at the Facility itself but rather at existing RV parks and campgrounds within a 30-mile commute distance.

If all migrant (non-local) construction workers sought temporary housing within the 10-mile Analysis Area, there would not be enough supply to meet that demand, and mitigation, such as on-site temporary housing facilities, would be required to diminish the significant housing impact to local communities. However, this cannot be assumed to occur. Industry experience indicates that construction workers are unlikely to relocate if commuting to work is an option, and that commuting an hour or more is common. Therefore, a 30-mile commute distance is certainly a conservative estimate based on keeping commute times to an hour or less. That distance includes the communities of Echo, Hermiston, Stanfield, Umatilla, Pilot Rock Pendleton, Ukiah, Boardman, Heppner, Ione, Irrigon, Lexington, Arlington, and Lonerock that have greater housing availability as noted above, as well as other amenities when compared to options within 10 miles, which would attract workers in need of temporary housing. Although it cannot be assumed that housing facilities will have vacancies at any given time, adequate supplies are available within a commutable distance in relation to the number of temporary workers, especially if a phased construction approach is taken (see upfront Division 27 document for the RFA). Additionally, experience with energy facility construction, for example during the peak of wind power construction in 2009 and 2010 near the community of Arlington, Oregon, demonstrates that multiple facilities can be built in an area comparable to the Analysis Area without creating local housing issues. Therefore, no significant adverse housing impacts from Facility construction are anticipated.

Permanent housing for about five new households (with up to three people per household) may be required starting at the beginning of operations. For the maximum 15 new permanent residents expected because of Facility operations, it is anticipated that adequate opportunities will be available to purchase housing or to construct new housing in the Analysis Area, or within a commutable distance from the Facility outside of the Analysis Area. Given the reasoning described in this section as well as the general availability of housing opportunities, no significant adverse impacts on the ability of communities to provide housing are anticipated from Facility construction or operations.

4.4.5 Transportation and Traffic Safety

4.4.5.1 Facility Trip Generation

Truck Traffic

The construction activities are anticipated to take approximately 12 months from mobilization until commercial operation. During construction, trucks will be using I-84, OR-207 and local county roads to bring construction equipment, turbine components, substation equipment, and Intraconnection Line equipment to the various Facility sites. Trucks will also be used to bring road base aggregate to improve existing county roads (if deemed applicable, shall be permitted through the counties) and construct new access roads; to bring concrete for the turbine, substations, and battery energy storage system (BESS); and to bring water for dust control. As noted previously, the majority of Facility materials and equipment, including all turbine component and large construction equipment loads, would arrive at the Facility via I-84 and OR-207. Bombing Range Road would be used for large component or equipment deliveries to the western portion of the Amended Site Boundary and would also be used for other truck traffic including deliveries of aggregate, water, and other construction materials. Figure U-2 identifies primary construction traffic routes to the Facility.

The estimate of number of construction trips is based on experience with traffic from similar sized wind farms and actual construction experience. Included in the estimate were the following major Facility elements:

- Civil construction and material (aggregate, culverts, etc.) supply for new roads and upgrades to existing roads; turbine erection pads and crane pads, BESS area, substations, laydown areas, collector lines, and the Intraconnection Line.
- Turbine and related component delivery including towers, nacelles, hubs, blades, pad mount transformers, substation equipment and transformers, collector line components, Intraconnection Line towers and conductor materials.
- BESS delivery, including containers, battery modules, and all related equipment based on the final technology selected;
- Material supply for turbine foundations (sand, aggregate, cement, and steel rebar).
    - The Certificate Holder assumes concrete will be batched on-site in temporary plants; local suppliers may be used instead at the option of the construction contractor;
- Delivery of on-site construction equipment such as cranes, dozers, graders, compactors, forklifts, etc.
- Water truck traffic (assumes water comes from Hermiston, Port of Morrow, Stanfield and Boardman).

Based on the above, the total number of trucks trips was estimated. For the wind farm construction alone, a 12-month construction period was assumed. For the Intraconnection Line, only a 6-month construction period was assumed. An estimated total of 21,330 truck trips (including delivery trips) would be required for the wind farm construction; the Intraconnection Line construction would require an estimated 2,450 trips. Over the 12-month wind farm construction period, and assuming an average of 24 working days per month, an average of 74 round trips (i.e., including return trips) per day would be generated by wind farm construction activities, and approximately 9 round trips per day would be generated by Intraconnection Line construction. It is further assumed that the Intraconnection Line construction would occur concurrently with the wind farm construction so that the combined average daily trips during the 6 months when both activities would be concurrent would be approximately 83 round trips per day. Since construction activity is not uniform, this number is increased by 25 percent to account for peak periods, yielding an estimated maximum of 104 round trips per day or 208 one-way trips per day.

Truck traffic during operation of the Facility would be minimal, and most of the time nonexistent. Heavy equipment may be brought in occasionally for major repairs or turbine replacement, but these occasions are expected to be few and far between.

Private Vehicle Traffic

Privately owned vehicles will be the primary means of transporting workers to and from the Facility on a daily basis. During construction an estimated average workforce of approximately 240 workers will be employed. During the peak months of construction activity, the estimated number of workers will increase to approximately 360. Most of the construction worker traffic would originate from the communities that are along I-84 stretching from Boardman to Pendleton; a small number may also live in the small communities of Lexington, Ione, Heppner, Ukiah, Lonerock, or Pilot Rock which are located southwest or southeast of the Facility. As such, the workforce will use the same roads to access the Facility as the equipment transporters.

Conservatively, it is assumed that most workers will drive alone and that the average vehicle will have 1.25 occupants. This makes the daily vehicle counts 288 for the peak period and 192 for the average workforce. These daily vehicle counts are doubled to account for each one-way trip, resulting in an estimated 576 peak or 384 average trips per day. Private vehicles would primarily travel early mornings and late evenings corresponding to the workday, whereas the construction truck traffic would be more uniformly distributed throughout the workday. As a result, the private traffic and the truck traffic would not overlap for the most part.

During operations, 5 to 10 employees will be hired for O&M. These employees will live in proximity to the Facility and use the same roads that will be used by the construction workforce. Occasionally during operations, specialty contractors will be brought in to handle major repairs. Operational traffic generation would be minimal.

Impacts to Existing Levels of Service

State, county, and local roads may be temporarily affected by construction related traffic but the impact is expected to be minimal. Truck traffic will generally not coincide with morning and evening peak hours; rather, truck traffic will be dispersed throughout the working day. The private vehicle traffic will generally occur out of phase with the truck traffic, as the workers report earlier and leave later than most of the truck traffic. Given the early start times (7 a.m.) and late finish times (7 p.m.) common to wind farm construction, worker commuting traffic likely will not overlap with peak traffic hours.

I-84 and OR-207 will see the largest number of trips, as delivery of aggregate, concrete, and water may originate from these roads and most of the communities likely to provide temporary housing are located along or near these roads. Overweight or oversize deliveries, such as turbine components, the Intraconnection Line poles and main power transformers, will be delivered via this route. As noted earlier, workforce traffic will also occur within the transportation route, with some traffic also using OR-74 from south of the Facility up to OR-207 and Bombing Range Road or Kilkenny Road, or exiting north onto Sand Hollow Road or Little Butter Creek Road. Bombing Range Road will also be used for some truck traffic (i.e., aggregate, water, and material deliveries) and large component or equipment deliveries when supplies are needed at the western portion of the Amended Site Boundary.

As described in Section 4.3.6.2, in 2021 I-84 carried an ADT volume of approximately 18,074 vehicles between Boardman and the Lexington-Echo Highway Interchange, Oregon. Based on the above ADT estimates, and assuming that all Facility traffic (both truck and personal vehicle traffic, peak amounts) would use I-84, construction vehicles will cause an increase in traffic of approximately 4 percent on average through I-84. This increase is expected to be inconsequential on the transportation route as the Interstate is operating well below its design capacity.

Also, on the transportation route, peak construction trips will increase ADT volumes on OR-207 (between I-84 and Lexington) on average by approximately 49 percent (greater just south of the OR-207, Oregon Trail Road intersection and lowest near I-84). This increase represents a moderate amount of traffic along most of OR-207. The OR-207 road segment with the greatest potential for impact is the section east of Hermiston Highway (OR-207) at milepost 27.29, which could see more than double the existing ADT volumes; Short-term delays are likely to occur during construction near this section of OR-207. OR-207 is also part of the primary transportation route to access recreation opportunities such as the Oregon Trail Echo Meadows Interpretive Site, however traffic impacts are anticipated to be temporary, intermittent, and minimal due to most construction traffic occurring during non-peak recreational hours (i.e., weekend)/outside of external commuter traffic hours and an alternate transportation route being available (northern portion of OR-74; see Exhibit T). Note that private vehicles would primarily travel early mornings and late evenings corresponding to the workday, whereas the construction truck traffic would be more uniformly distributed throughout the workday. As a result, the private traffic and the truck traffic would not overlap for the most part. See Section 4.4.5.3 for impact minimization measures.

On the alternate workforce traffic route along OR-74 between Lexington and Little Butter Creek Road, peak construction vehicles (solely private vehicles since truck traffic will not use OR-74) will increase the ADT volumes by an average of approximately 36 percent. This increase represents a moderate amount of traffic along most of OR-74. The OR-74 road segments with the greatest potential for impact are the sections past Heppner, starting at milepost 46.34 through 62.10, which could see more than double the existing ADT volumes; Short-term delays are likely to occur during construction near these sections of OR-74, however traffic impacts are anticipated to be temporary, intermittent, and minimal due to most construction traffic occurring during non-peak recreational hours (i.e., weekend) and outside of external commuter traffic hours. Note that travel on OR-74 would be limited to commuter/private vehicle traffic with no truck traffic; Private vehicles would primarily travel early mornings and late evenings corresponding to the workday. See Section 4.4.5.3 for impact minimization measures.

Along Bombing Range Road at its peak level, ADT may increase by as much as 29 percent; however, given the lack of recent ADT information for Bombing Range Road (2005 ADT data; Section 4.3.6.2), the increase could be much less. Bombing Range Road is part of the route used to access the Oregon Trail Echo Meadows Interpretive Site; however, impacts are anticipated to be minimal due to Facility construction traffic being intermittent and temporary in nature and due to the OR-74 alternate transportation route (see Exhibit T).

ADT values are unavailable for the remaining county roads proposed as transportation routes; however, capacity deficiencies on any county roads are not anticipated due to the low V/C ratios (Section 4.3.6.4; Morrow County 2012; Umatilla County 2002).

4.4.5.2 Traffic and Design Standards

Traffic Standards

State highways are designed and constructed to handle legal loads of 80,000 pounds without a permit. During construction, it may be necessary for trucks exceeding the legal load limit to access the site via state highways. These trucks would potentially be used to deliver large and heavy construction equipment such as the base tower sections, nacelles, main transformers and blades. Before construction, the transportation contractor will consult with the Morrow County Road Department, the Umatilla County Public Works Road Department, and ODOT to determine whether any segments of roadway or bridges are restricted for travel, and to obtain any oversize/overweight permits required to allow transport of these loads. There are no permanent restrictions on state highways proposed for the transportation route. Because the state highways are built to accommodate overweight vehicles without permits, impacts to safety or roadway pavement conditions are not expected. Currently, the transportation route has good pavement conditions, with three segments of fair conditions and one segment under construction as of September 2020 (see above Section 4.3.6.3). Vehicles up to 75 feet in length are allowed without special permitting on the transportation route.

County and local roadways proposed as part of the Facility construction transportation routes are also constructed for legal loads, and thus construction truck traffic is not anticipated to adversely impact these roads. All county and local roads are paved with the exception of Strawberry Lane and Eagle Ranch Road which are graveled. Any existing road design standards that will be required are discussed below.

The requirements imposed by Morrow County, Umatilla County, and ODOT effectively prevent significant impacts to traffic safety or maintenance needs along the transportation routes identified in this exhibit.

Design Standards

County and local roadways are expected to safely accommodate Facility construction traffic. Some of the county or local roads will require upgrading to accommodate the truck traffic associated with the wind farm construction. This may include road widening, replacing cattle guards, replacing or adding cover to culverts, or adding road base aggregate to the existing roads. Note that road conditions could change, thus Road Use Agreements with both counties will reflect what is actually needed at the time of preconstruction compliance for the Facility (per Condition PRE-PS-02). To ensure the integrity of local roads, the Certificate Holder will coordinate with local transportation officials to make improvements where necessary to accommodate Facility construction traffic, and improvements will be restricted to areas within the respective rights-of-way. Note that no road improvements are proposed at this time, and if road improvements are deemed necessary prior to construction, permitting will be sought through the counties.

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

4.4.5.3 Impact Minimization Measures

Agency Coordination

The Certificate Holder will coordinate with ODOT and with county roads officials as needed on road improvements (if applicable), road closures, and permits needed for construction or movement of oversized loads of construction equipment or materials. Three permits from ODOT may be required (see also Section 5 of the upfront Division 27 document for the RFA):

- **Oversize Load Movement Permit/Load Registration.** This permit is required for the movement of oversize or overweight loads on state highways, such as construction cranes, substation transformers, or other large equipment.
- **Permit to Occupy or Perform Operations Upon a State Highway.** This permit addresses utility installations within the right-of-way of a state highway, including the crossing of a state highway by the Facility.
- **Access Management Permit.** This permit may be needed if a Facility access road intersects directly with a state highway, and improvements are required at that intersection.

In addition to these state permits, the Certificate Holder will coordinate with county roads officials as needed to address necessary road improvements (if applicable), temporary road closures, oversize load movements, and monitoring of impacts to county roads. Pursuant to ORS 374.305, all affected counties require permitting for any work to be done within a county right-of-way, including making improvements to roads or intersections (if applicable), or crossing a county road with the Intraconnection Line. The specific permit requirements and the names of those permits vary from county to county, as indicated in Section 5 of the upfront Division 27 document for the RFA; the Certificate Holder will verify and comply with all local permit requirements prior to beginning construction on the Facility.

Per Conditions PRE-PS-01 and PRE-LU-06, a traffic management plan will be developed prior to construction in cooperation with Morrow and Umatilla Counties, and with nearby cities, if necessary, to minimize impacts to traffic safety. The traffic management plan would address such issues as flagging, signage and traffic flow around work sites on public roads; timing of oversize/overweight truck loads to avoid impacts to school bus schedules or during peak travel hours; and other mitigation measures if deemed necessary. These measures would help to prevent any construction-related traffic safety issues and would facilitate the free movement of traffic through the Facility vicinity. While the movement of heavy or oversized loads of construction materials or equipment may cause some localized traffic delays, these disruptions would be intermittent and temporary.

The Certificate Holder will cooperate with both of the Public Works departments in Morrow and Umatilla counties with respect to obtaining permits to improve any roads (if applicable) and also to make repairs to any damage to roads that might result from construction traffic. In addition, the Certificate Holder expects to enter into road use agreements with both counties, to ensure that

public roads impacted by construction will be left in 'as good or better' condition than that which existed prior to the start of construction (per Condition PRE-PS-02).

Transportation Best Management Practices

To minimize conflicts between Facility traffic and background traffic, movements of normal heavy trucks (dump trucks, concrete trucks, standard size tractor-trailers or flatbeds, etc.) will be minimized (essential deliveries only), to the extent practicable, during peak traffic times. Movements of oversize trucks will be minimized during peak times (e.g., rush-hour traffic periods), to the extent practicable. If possible, and considering worker safety, such oversize deliveries will occur during other parts of the day, when background traffic tends to be lower, such as late morning and early afternoon. The Certificate Holder will work with local law enforcement as appropriate to assist with Facility deliveries.

In addition, the Certificate Holder's construction contractor will implement the following best management practices as necessary:

- Coordinating the timing and locations of road closures or oversize load movements in advance with emergency services such as fire, paramedics, and essential services such as mail delivery and school buses.
- Maintaining emergency vehicle access to private property.
- Developing plans as required by county or state permit to accommodate traffic where construction would require closures of state- or county-maintained roads for longer periods.
- Consulting with and notifying the landowners prior to the start of construction to minimize disruptions to ranching and farming operations (e.g., harvest time activities requiring tractor movement between fields or trucks delivering agricultural products to market) due to construction activities such as equipment delivery.
- Constructing a majority of the Facility during the summer months when school is not in session to prevent traffic interference.
- Posting signs on county- and state-maintained roads, where appropriate, to alert motorists of construction and warn them of slow, merging, or oversize traffic.
- Using traffic control measures such as traffic control flaggers, warning signs, lights, and barriers during construction to ensure safety and to minimize localized traffic congestion. These measures will be required at locations and during times when trucks will be entering or exiting highways frequently.
- Using chase vehicles as required (or police vehicles, if required by ODOT) to give drivers additional warning.
- Notifying landowners prior to the start of construction near residences.

- Restoring residential areas as soon as possible, and installing temporary exclusion fencing around all construction areas near residences at the end of each construction day. Gates will be installed on access roads to reduce unauthorized access when requested by property owners.
- Maintaining at least one travel lane at all times will be required so that roadways will not be closed to traffic due to construction vehicles entering or exiting public roads.

4.4.5.4 Air Transportation

No less than 30 days prior to construction, the Certificate Holder will submit FAA form 7460-1 to the FAA and ODA in accordance with ORS 836.535(2)(a) requesting a determination of No Hazard in order to allow the agency to evaluate the effect of the proposed construction on air safety and navigable airspace (Condition PRE-PS-04). This evaluation process begins with a determination of whether the proposed structure represents an obstruction.

The Facility meets the first threshold to notify the FAA for evaluation of the proposed wind turbines for their potential hazard to air traffic. The Certificate Holder is required to submit notice to the FAA and ODA due to the overall height of the considered wind turbine model exceeding 200 feet above ground level. There are no public airports located within 5 miles of the Facility. Although the West Buttercreek airfield is located within 2.1 miles of the Amended Site Boundary, it does not meet the FAA definition of an airport; it is not a public airfield, is not operated by a federal agency or the Department of Defense, and does not have an approved Instrument Approach Procedure[2]. Therefore, the Facility does not meet the second threshold for notifying the FAA and ODA.

4.4.6 Fire Protection

The relatively small number of new temporary residents and new permanent residents are not expected to place significant new demands on the fire protection forces that serve the area. The greatest risk of fire occurs during construction, particularly from metal cutting and welding. In addition, fire hazards can result from workers smoking, refueling vehicles and equipment, and operating or parking vehicles and other equipment off roadways in areas of tall dry grass that could ignite upon contact with hot vehicle parts (e.g., mufflers or catalytic convertors).

Fire danger during construction can be significantly reduced through the implementation of safe working practices, such as maintaining adequate firefighting equipment and water supplies on hand during operations that carry a high fire risk, conducting metal cutting and welding within a cleared or graveled area, and preventing parking of vehicles in areas with high, dry grass. Implementation of the Wildfire Mitigation Plan as outlined in the new Exhibit V will further reduce fire danger at the Facility. The following subsections provide a summary of typical fire prevention measures that will be implemented during Facility construction.

[2] The West Buttercreek Airport is a private field that the FAA does not evaluate. It is located approximately 3.7 miles from an existing, operating commercial wind power project, with multiple turbines located west of the airport. The nearest proposed Facility turbine would be over 3.4 miles to the east of the airport.

4.4.6.1 Fire Prevention

During periods of high fire danger, potential sources of fire ignition (vehicle exhaust systems, cigarettes, matches, propane torches, sparks from various hot work operations, etc.) must be used with extra precaution. Additionally, the BESS adds an additional fire risk. but existing Site Certificate conditions are sufficient to be meet the Public Services standard.

The BESS will be restricted from the public via a fenced and secured site, have a gas pressured deluge fire suppression system, an emergency action plan if an emergency should occur (Condition PRE-PS-05; see Wildlife Mitigation Plan, Exhibit V), and be operated and maintained by trained and skilled operations personnel. The system will be kept in a temperature-controlled facility with individual battery modules isolated to prevent the spread of fire if it were to occur. The BESS will be stored in completely contained, leak-proof modules and will be frequently (monthly) inspected by O&M staff according to the manufacturer's recommendations. The BESS and fire protection systems will comply with applicable standards specified by the Umatilla County building department through the permitting process, which will include the 2019 Oregon Structural Specialty Code et. seq., as documented through the facility's building permit application(s).

Any transportation of lithium-ion batteries for the BESS is subject to 49 Code of Federal Regulations 173.185, as described in Exhibit G (Conditions GEN-OE-04 and OPR-PS-03). The regulations include requirements for the prevention of a dangerous development of heat, short circuits, and damage to the terminals, and also require that no battery come in contact with other batteries or conductive materials. Adherence to the requirements and regulations, personnel training, safe interim storage, and segregation from other potential waste streams will minimize any public hazard related to the transport, use, or disposal of batteries.

4.4.6.2 Vehicles

- Plan and manage the work and the movement of vehicles. No off-road driving is to be done while working alone.
- General Contractor will be responsible for identifying and marking the path for all off-road vehicle travel.
- All vehicle travel off-road is to stay on the identified path.
- In the event a vehicle gets stuck, shut the engine off. Periodically inspect the area adjacent to the exhaust system for evidence of ignition of vegetation. Do not "rock" the vehicle to free it, rather, pull it out. Inspect the area after the vehicle has been moved.
- In tall grass (i.e., tall or taller than the exhaust system of the vehicle), pre-wet the area with water prior to driving on it with vehicles.

4.4.6.3 Fueling

- General Contractor will designate a location for field fueling operations at the temporary construction yard(s). Any fueling of generators, pumps, etc. shall take place at this location only.
- Fuel containers, if used, shall remain in a vehicle or equipment trailer, parked at a designated location alongside county R/W. No fuel containers shall be in the vehicles that exit the R/W with the exception of one – five gallon container that is required for the water truck pump.

4.4.6.4 Smoking

- Smoking shall only be allowed in designated smoking areas on the project.

4.4.6.5 Fire Suppression and Emergency Preparedness

The site will be equipped with the following including instruction in proper use:

- Each vehicle used onsite shall have a fire extinguisher of sufficient type and capacity to suppress small fires around vehicles. Vehicle occupants shall be familiar with the location of these fire extinguishers. All employees who may have a need to use a fire extinguisher shall be current in their training on the general principals of fire extinguisher use and the hazards involved with incipient stage firefighting. Fire prevention and response training will be required for all onsite employees (Condition GEN-PS-03).
- Prior to start of construction work activities, contact the local fire department and advise them of work type, location, and probable duration.
- Prior to performing hot work (anything that creates a spark or an open flame is considered hot work) fire suppression equipment must be immediately available, hot work must only be done on road or turbine pad surfaces cleared of vegetation (Condition CON-PS-05), and the on-site Fire Safety Supervisor must be notified (see Wildlife Mitigation Plan, Exhibit V).
- A fire watch, equipped with a suitable fire extinguisher, shall be maintained for a period of 60 minutes after completion of hot work in a specific area and at the end of each day's activities.
- A final site plan and contact information will be submitted to the appropriate fire protection officials and updated as necessary per Conditions PRO-PS-02 and OPR-PS-04.

4.4.6.6 Emergency Notification and Follow Up

The following course of action should be taken if an emergency situation develops:

- Evacuate as necessary. Maintain site security and control if possible. If crews are working at different areas of the site, a designated meeting location will be created for all people to gather.

- Notify proper emergency services (fire, ambulance, etc.) for assistance.
- Notify site management on radio channel #1 of any possible fires.
- Prepare a summary report of the incident as soon as possible after the incident.
- These emergency procedures as well as routine protocols shall be implemented through the Emergency Management Plan as required by Condition PRE-PS-05. All personnel and agency contact information within the plan shall be continuously updated as necessary.

During the O&M phase of the Facility, fire danger will be minimal. Wind turbines contain a number of safety features designed to provide increased fire protection, for example, fully independent braking systems and emergency shutoff devices (Condition CON-WF-02). In addition, the turbine model considered would be equipped with internal fire suppression systems in the nacelles. The BESS must be kept in a temperature-controlled facility with individual battery modules isolated to prevent the spread of fire if it were to occur. The BESS will incorporate a fire sprinkler system as designed by the battery manufacturer. The BESS will be stored in completely contained, leak-proof modules. O&M staff will conduct frequent inspections of the BESS according to the manufacturer's recommendations, which are assumed to be monthly inspections. The shared/existing O&M building is equipped with fire protection equipment in accordance with Oregon Fire Code, and the substations, collector lines, and other electrical connections will be built to National Electrical Safety Code standards. In addition, the portions of the Amended Site Boundary that will be graded will be replanted with a low-growing mix of grasses. The site will be mowed as needed for fire safety requirements and to keep vegetation from interfering with O&M activities (see Wildfire Mitigation Plan, Exhibit V). Typical maintenance activities would not carry a significant fire risk, while maintenance vehicles would drive and park on maintained gravel roads and turbine pads, avoiding hazards associated with driving or parking in tall dry grass. Given the inherent fire-safety features of Facility components and the relatively small number of new temporary and permanent residents, significant new demands on fire protection forces are not anticipated.

The Certificate Holder has contacted all of the fire protection providers listed below: see Attachments U-2 through U-5.

Morrow County:

- Boardman Fire Rescue District: Fire Chief Michael Hughes
- Heppner Volunteer Fire Department: Fire Chief Steven Rhea
- Ione Rural Fire Protection District: Fire Chief Virgil L. Morgan

Umatilla County:

- Echo Rural Fire District: Fire Chief Delbert Gehrke

All have indicated that the construction and operation of the Facility will not impact their ability to provide fire protection services to their respective districts. Additionally, all have stated that they do not have the ability to perform high altitude nor confined space rescues. The Echo Rural Fire Distract Chief also requested that 100-foot vegetation free zones be maintained around structures

as applicable; the Facility is in a high-risk zone for wildland fires and is subject to Oregon Senate Bill 762 as it is implemented for defensible space requirements. See Exhibit V for wildfire prevention measures.

4.4.7 Law Enforcement

Construction and operation of the Facility would not have a substantial adverse impact on the provision of law enforcement services in the Analysis Area. The estimated number of temporary and permanent residents are not expected to place significant new demands on police in the area. The Certificate Holder has contacted all of the law enforcement service providers listed below (see Attachments U-6 and U-7):

Morrow County:

- Undersheriff: John A. Bowles

Umatilla County:

- Sheriff: Terry Rowan

Both have indicated that they can provide services to the Facility without impact to their current customer service base. Any impacts to law enforcement caused by the Facility would be intermittent and temporary, as construction workers would remain in any one location for not more than 6 to 12 months, and would not be expected to stay beyond the end of construction in an area. The estimated number of temporary and permanent residents are not expected to place significant new demands on police in the area. The construction contractor will be responsible for providing on-site security in the Facility area. As required by Condition CON-PS-02, onsite 24-hour security during construction and effective communications will be established between onsite security personnel and the local sheriff offices.

4.4.8 Health Care

The small number of new temporary workers and additional permanent resident employees is not expected to place significant new demands on routine health care services. However, impacts on health care could occur if Facility construction activities were to result in an increase in the use of emergency health care services exceeding the capacity of local providers.

Construction and operation of the Facility will not have an adverse impact on area health care providers. Impacts on local health care services during both construction and operation will be minimized by implementation of a robust safety program that will minimize health and safety risks. Should any worker suffer an injury that requires immediate medical attention, such injured workers would be transported using one of the local ambulance services. Any worker suffering minor injuries would be transported and treated at the Pioneer Memorial Hospital in Heppner or the Good Shepherd Medical Center in Hermiston. Workers suffering more serious injuries would be taken to the Mid-Columbia Medical Center in The Dalles, or would be flown by helicopter (operated

by Life Flight) to one of the two Level 1 hospitals located in Portland: Oregon Health Sciences University Hospital or Legacy Emmanuel Medical Center.

The construction contractor will be responsible for implementing a safety program, which is expected to prevent nearly all serious injuries that would require ambulance or hospital services. Area ambulance services and hospitals appear to have adequate capacity and the Facility should not impact their ability to serve local communities.

4.4.9 Schools

No significant adverse impacts to schools are anticipated during construction and operation of the Facility. No schools are located within the Amended Site Boundary or would be directly affected by Facility construction or operations. Construction will be temporary and short-term, and much of the peak work period will occur during the summer months when school is not in session. The trend in construction projects of this nature is that only a small percentage of workers hired from outside the area bring their families and school-age children for a short-term relocation, so the number of additional students would be minimal (USDE 2010). The number of permanent new resident employees would also be small, and new families with school age children will be welcomed at local area schools. Impacts on school services will depend on the housing choices of new residents with children, which cannot be predicted; however, given the number of schools in the locations in which new residents are likely to settle, and the small number of new school children expected, it is unlikely that any one school will receive more new students than it can accommodate.

To the degree practicable, the Certificate Holder will coordinate the timing of large component or equipment deliveries to avoid peak hours for school buses and impacts to bus routes. Note that truck traffic (inclusive of large component or equipment deliveries) will generally not coincide with morning and evening peak hours; rather, truck traffic will be dispersed throughout the working day. School buses are anticipated to be operational in the mornings and evenings, before and after schools are in session, and thus are not anticipated to coincide with the timing of Facility construction truck traffic.

5.0 Proposed Monitoring Programs – OAR 345-001-0010(1)(u)(E)

OAR 345-001-0010(1)(u)(E) The applicant's proposed monitoring program, if any, for impacts to the ability of the providers identified in (B) to provide the services listed in OAR 345-022-0110.

The following plans were previously identified for monitoring potential Facility impacts on service providers and are now Conditions:

- Provide employees fire prevention and response training and equivalent training for new employees or subcontractors working on the site and retain records (Condition GEN-PS-03).
- Prepare an Emergency Management Plan, maintain the plan, and train onsite workers on the fire prevention and safety procedures (Condition PRE-PS-05).
- Develop a site Health and Safety Plan, update the plan annually, and maintain through operations (Condition PRE-PS-06).
- Ensure all construction workers are certified in first aid, cardiopulmonary resuscitation and automated external defibrillator use; maintain records and certification; and keep a working automated external defibrillator onsite during construction (Condition PRE-PS-07).
- Provide 24-hour onsite security during construction and develop effective communications with local sheriff's offices (Condition CON-PS-02).
- Provide a final site plan to the identified fire protection districts and first-responders included in the Emergency Medical Plan (Condition PRO-PS-02).
- Prepare a Traffic Management Plan to include procedures and actions described in the Project Order and mitigation measures identified in Section 4.4.5 (Conditions PRE-PS-01 and PRE-LU-06).
- Enter into Road Use Agreements with counties and conduct pre-construction assessments, construction monitoring, and post-construction inspection and repair as required by counties public works departments (Conditions PRE-PS-02 and PRE-PS-03).
- Provide Notices of Proposed Construction or Alteration and an aeronautical study to the FAA and ODA, implementing mitigation as required (Condition PRE-PS-04).

The modifications proposed under RFA 1 do not affect the Certificate Holder's ability to comply with these conditions and no new monitoring programs are required as a result of the proposed modifications.

6.0 Conclusions

Based on the evidence presented in this Exhibit U, the Council may rely on its earlier findings to conclude in accordance with OAR 345-022-0110 that the construction and operation of the Facility, as modified under RFA 1, taking into account Site Certificate conditions, is not likely to result in significant adverse impacts on the ability of the providers within the Analysis Area to provide the following services: sewers and sewage treatment, water, stormwater drainage, solid waste management, housing, traffic safety, police and fire protection, healthcare, and schools.

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Figures

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Wheatridge Renewable Energy Facility East

Figure U-1 Analysis Area of Public Services

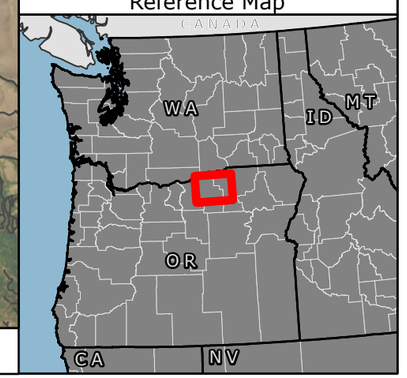
MORROW AND UMATILLA COUNTIES, OR

- Amended Site Boundary
- Amended Wind Micrositing Corridors
- Analysis Area (10-mile Buffer)
- City/Town
- State Boundary
- County Boundary
- Interstate Highway
- US Highway
- State Highway
- County Highway
- Local Roads

TETRA TECH

NEXTera ENERGY RESOURCES

Reference Map



Klickitat County
Benton County
Boardman
Hermiston
Stanfield
Echo
Nolin
Rieth
Cecil
Morrow County
Umatilla County
Ione
Lexington
Heppner
Gilliam County
14
30
84
687
689
730
930
82
1198
395
37
320
578
207
735
813
74
206

1:260,000 WGS 1984 UTM Zone 11N

0 2 4 8 12 16 Miles

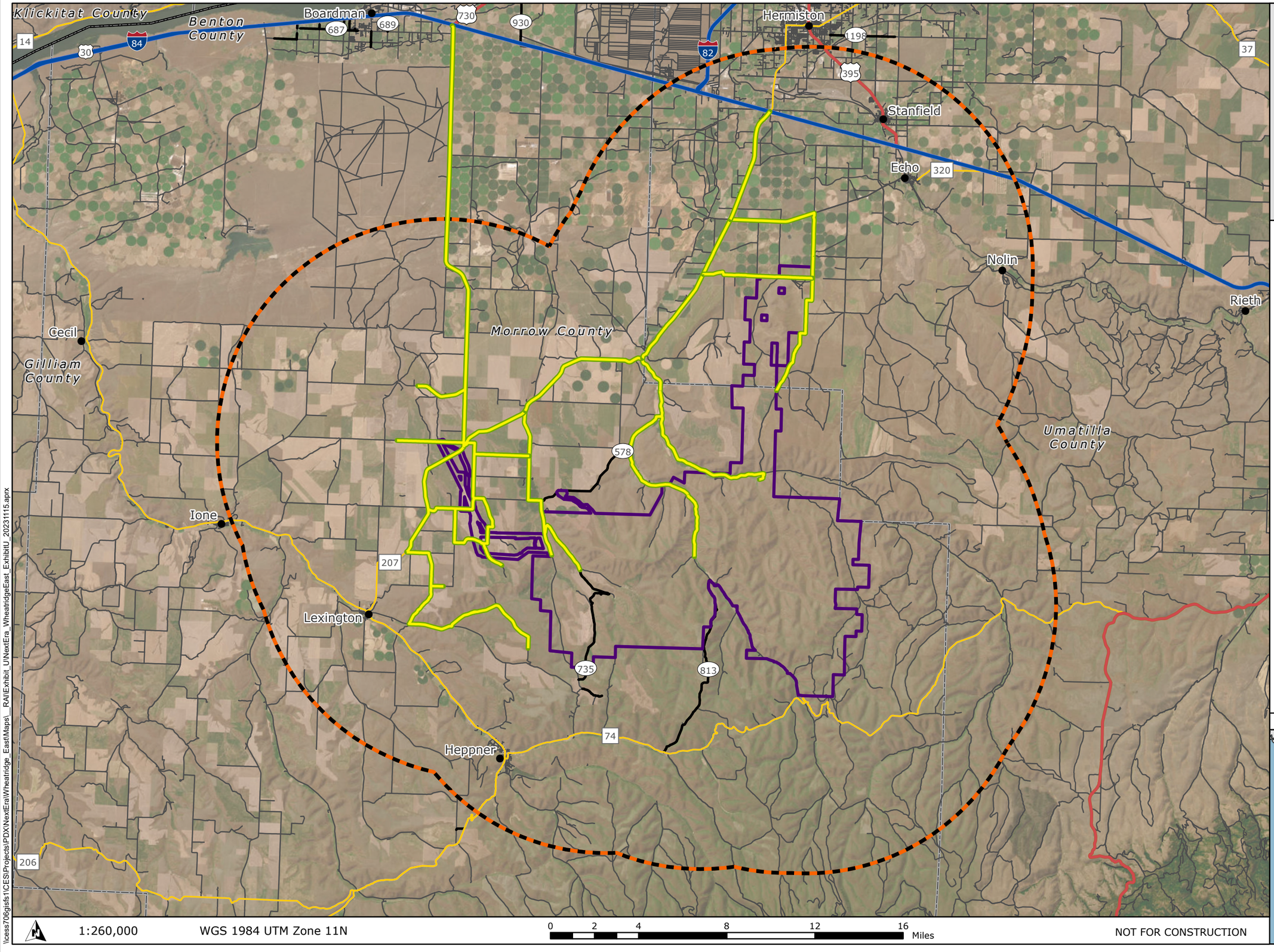
NOT FOR CONSTRUCTION

\\cess706gisfs1\CES\Projects\PDX\NextEra\Wheatridge_East\Maps__RAI\Exhibit_U\NextEra_WheatridgeEast_ExhibitU_20231115.aprx

Wheatridge Renewable Energy Facility East

Figure U-2
Primary Construction Transportation Routes

MORROW AND UMATILLA COUNTIES, OR

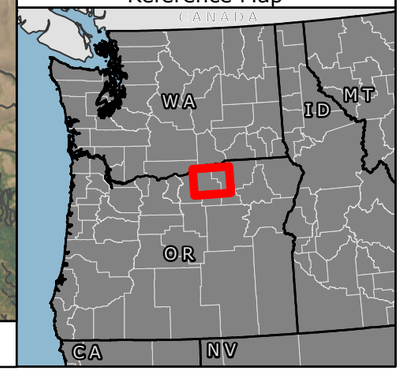


- Amended Site Boundary
- Amended Wind Micrositing Corridors
- Analysis Area (10-mile Buffer)
- City/Town
- State Boundary
- County Boundary
- Interstate Highway
- US Highway
- State Highway
- County Highway
- Local Roads
- Transportation Route

TETRA TECH

NEXTera ENERGY RESOURCES

Reference Map



1:260,000

WGS 1984 UTM Zone 11N

0 2 4 8 12 16 Miles

NOT FOR CONSTRUCTION

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Attachment U-1. Record of Correspondence with Finley Butte Landfill

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From:	Jocelyn Jones
To:	Gulick, Kristen
Subject:	RE: ATTENTION/RESPONSE REQUIRED ASAP: Finley Buttes Landfill Agreement with Wheatridge Renewable Energy Facility East/Wheatridge Wind/Solar Project
Date:	Thursday, June 30, 2022 10:14:51 AM
Attachments:	image002.png

Good Morning Kristen,
Yes Finley Buttes is still able to accept the quantities proposed. Finley has a proposed life span of 180 more years.

Jocelyn Jones | Business Development
Wasco County and Finley Buttes
Western Region – Waste Connections
501 SE Columbia Shores Blvd. Ste 350 Vancouver, WA 98661
Mobile: 360.936.0386|jocelynr@wcnx.org

From: Gulick, Kristen <Kristen.Gulick@tetratech.com>
Sent: Tuesday, June 28, 2022 9:39 AM
To: Jocelyn Jones <Jocelyn.Jones@WasteConnections.com>; Jocelyn Jones <Jocelyn.Jones@WasteConnections.com>; Dean Large <Dean.Large@WasteConnections.com>; Jeff Bishop <Jeffrey.Bishop@WasteConnections.com>; Kevin Green <Kevin.Green@WasteConnections.com>
Cc: CUSTOMERSERVICE2050 <CUSTOMERSERVICE2050@WasteConnections.com>; CUSTOMERSERVICE2050 <CUSTOMERSERVICE2050@WasteConnections.com>
Subject: ATTENTION/RESPONSE REQUIRED ASAP: Finley Buttes Landfill Agreement with Wheatridge Renewable Energy Facility East/Wheatridge Wind/Solar Project

Hello,
I am contacting you on behalf of the proposed Wheatridge Renewable Energy Facility East (WREFE). WREFE would be collocated and operated by the same owners (NextEra) as already constructed, operational Wheatridge Renewable Energy Facilities (Wheatridge). WREFE would be an up to 300-megawatt wind energy generation facility with related or supporting facilities in Umatilla and Morrow County, Oregon. More information on Wheatridge can be found here: https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WRW.aspx, https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WREF-I.aspx, https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WREF-II.aspx, and https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WREFIII.aspx; and more information on WREFE can be found here: https://www.oregon.gov/energy/facilities-

safety/facilities/Pages/WREFE.aspx

Correspondence was received from you in 2018 confirming that the Finley Buttes Landfill will be able to accommodate the waste produced by a portion of the now operational Wheatridge. Please see attached records of correspondence. Therefore, we are hoping you could provide an updated letter confirming that you can accommodate the same amount for WREFE (non-hazardous waste). This is our current, conservative, estimate of waste anticipated for facility construction over a 9 to 12-month period.

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

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

Thank you!

Kristen Gulick (she/her) | Environmental Planner II | Tetra Tech
Mobile (**541) 740-3316** | kristen.gulick@tetratech.com

TETRA TECH

From:	Dean Large
To:	Gulick, Kristen
Cc:	CUSTOMERSERVICE2050; cust2050@wcnx.org; Jeff Bishop; Kevin Green; Jocelyn Jones
Subject:	Re: RESPONSE NEEDED ASAP - Finley Butte Landfill Agreement with Wheatridge Wind/Solar Project
Date:	Wednesday, October 17, 2018 4:27:17 PM

Finley Buttes Landfill's ability to receive your waste remains the same.
Thanks

Sent from my iPhone

On Oct 17, 2018, at 12:53 PM, Gulick, Kristen <Kristen.Gulick@tetratech.com> wrote:

> Hello,
> I am contacting you on behalf of the Wheatridge Wind/Solar Project.
> Correspondence was received from you in 2015 confirming that the Finley Butte Landfill will have the adequate capacity to handle the construction waste generated by the project.
>
> This correspondence occurred during the original project development phase and we are contacting you in regards to the new phase, the addition of a solar array, to verify that you are still able to provide the same service (assuming mutually agreeable terms can be reached). Please see the attached letter of correspondence.
>
> If you could please confirm that the correspondence agreement is still accurate as soon as possible, that would be greatly appreciated. This is a very quick project turn-around. It can be a statement on your letterhead with your signature if you like, or even a reply to this email that Finley Butte can adequately handle 9,000cy of waste over a 34 weeks period.
>
> Thanks so much,
>
> **Kristen Gulick** | **Environmental Planner**
> Kristen.Gulick@tetratech.com
>
> **Tetra Tech** | **Portland**
> 1750 SW Harbor Way, Suite 400 | Portland, OR 97201 | www.tetratech.com
> Direct: 503.721.7216 x 2241 | Fax: 503.227.1287 | Cell: 541.740.3316
>
>
>
>  **Think Green - Not every email needs to be printed.**
>
> <Finley Butte Landfill Correspondence.pdf>

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Attachment U-2. Record of Correspondence with Boardman Fire Rescue District

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Boardman Fire Rescue District

(541) 481-FIRE (3473) Fax (541) 481-0909 e-mail: mhughes@boardmanfd.com

Mike Hughes, Fire Chief

Marty Broadbent, Fire Marshal **Suzanne Gray, Executive Assistant**

300 Wilson Lane, Boardman, Oregon 97818

June 29, 2022

Kristen Gulick
Environmental Planner II
Wheatridge Renewable Energy Facility East
Tetra Tech
kristen.gulick@tetratech.com

Ms. Gulick,

As requested via email June 27, 2022, Boardman Fire Rescue District will aid local Fire Districts in fire protection as needed for the Wheatridge Wind/Solar Project. Please consider this as confirmation of continuance of the 2015 and 2018 correspondence agreement.

Two changes have occurred.

The name is now Boardman Fire Rescue District.
The Fire Chief since March 2020 is Michael Hughes.
All intentions of the agreement remain as stated in the first paragraph.

Sincerely,

Michael Hughes
Fire Chief

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Attachment U-3. Record of Correspondence with Echo Rural Fire Protection District

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Echo Rural

Fire Protection District

PO Box 59

Echo OR 97826

7/14/2022

To Whom It May Concern:

The Echo Rural Fire Protection District does not have any concerns with the Wheatridge Renewable Energy Facility East (WREFE) with the notations that Echo RFPD does not provide high angle rescues nor confined space rescues. We will respond to any fires or provide initial emergency medical response if required.

Echo RFPD also requests that if any structures are required for the project that a 100 foot vegetation free zone be maintained around the structures. TetraTech has indicated that a vegetation management program around structures would be added to their overall site management processes. The project is in a high risk zone for wildland fires and will be subject Oregon Senate Bill 762 as it is implemented for defensible space requirements.

Sincerely,

Chief Delbert Gehrke

Echo Rural Fire Protection District

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Attachment U-4. Record of Correspondence with Heppner Volunteer Fire Department

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From: City Manager
To: Gulick, Kristen
Subject: RE: ATTENTION/RESPONSE REQUESTED: Heppner Volunteer Fire Department"s Agreement with Wheatridge Renewable Energy Facility East/Wheatridge Wind/Solar Project
Date: Monday, August 22, 2022 10:23:04 AM
Attachments: image002.png

We have a voluntary Fire Staff and this includes the Fire Chief. I spoke about this to him and nothing has changed. For the most part as to where this is located we would be back up and not the initial call.

From: Gulick, Kristen <Kristen.Gulick@tetratech.com>
Sent: Monday, August 22, 2022 10:16 AM
To: Steven Rhea <srhea0512@gmail.com>
Cc: Edie Ball <heppner@centurytel.net>
Subject: FW: ATTENTION/RESPONSE REQUESTED: Heppner Volunteer Fire Department's Agreement with Wheatridge Renewable Energy Facility East/Wheatridge Wind/Solar Project
Importance: High

Hello,
I just wanted to check in on the status of this request. Let me know if there are any questions or concerns!

Thank you!

Kristen Gulick (she/her) | Environmental Planner II | Tetra Tech
Mobile (**541) 740-3316** | kristen.gulick@tetratech.com

TETRA TECH

From: Gulick, Kristen
Sent: Monday, July 25, 2022 10:24 AM
To: Steven Rhea <srhea0512@gmail.com>
Cc: Edie Ball <heppner@centurytel.net>
Subject: FW: ATTENTION/RESPONSE REQUESTED: Heppner Volunteer Fire Department's Agreement with Wheatridge Renewable Energy Facility East/Wheatridge Wind/Solar Project
Importance: High

Hello,

I am contacting you on behalf of the proposed Wheatridge Renewable Energy Facility East (WREFE). WREFE would be collocated and operated by the same owners (NextEra) as already constructed, operational Wheatridge Renewable Energy Facilities (Wheatridge). WREFE would be an up to 300-megawatt wind energy generation facility with related or supporting facilities in Umatilla and Morrow County, Oregon. More information on Wheatridge can be found here: https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WRW.aspx, https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WREF-I.aspx, https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WREF-II.aspx, and https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WREFIII.aspx; and more information on WREFE can be found here: https://www.oregon.gov/energy/facilities-safety/facilities/Pages/WREFE.aspx

Correspondence was received from you in 2013 confirming that the Heppner Volunteer Fire Department will be able to provide fire protection services as needed for Wheatridge (one of five fire departments in the area that can provide services). Please see attached record of correspondence. Therefore, we are hoping you could provide an updated letter confirming that you can provide the same services for WREFE.

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

If you could please provide an updated letter addressing the Wheatridge Renewable Energy Facility East as soon as possible, that would be greatly appreciated. It can be a statement on your letterhead with your signature if you like, or even a reply to this email.

Thank you!

Kristen Gulick (she/her) | Environmental Planner II | Tetra Tech
Mobile (**541) 740-3316** | kristen.gulick@tetratech.com

Attachment U-5. Record of Correspondence with Ione Rural Fire Protection District

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I.R.F.P.D

Ione Rural Fire Protection District

PO Box 6 – 160 West Main Street

Ione, Oregon 97843

541-422-7303

August 30, 2022

Carrie Konkol

Tetra Tech, Inc.

1750 SW Harbor Way, Suite 400

Portland, Or 07201

503-721-7225 ext. 2258

The Ione Rural Fire Protection District is one of five departments that will provide protection to the area where Wheatridge Wind Energy Facility, including energy storage will be located.

Ione RFPD does not provide high angle or confined space rescue.

We find that this wind facility will not have a significant impact on the ability to fight wildfired.

Sincerely,

Virgil L. Morgan

Virgil Morgan

Ione RFPD Fire Chief

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Attachment U-6. Record of Correspondence with Morrow County Sherriff

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MORROW COUNTY SHERIFF

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

Kenneth W. Matlack, Sheriff
John A. Bowles, Undersheriff

Date: 07-05-2022

To: Kristen Gulick

From: John A. Bowles, Undersheriff

Re: Wheatridge Renewable Energy Facility East (WREFE)

The Morrow County Sheriff's Office is the primary Law Enforcement agency for the area in which the Wheatridge Renewable Energy Facility East (WREFE) will be located. This project is in a low to medium crime area in our county.

The Sheriff's Office will respond appropriately and as necessary to all complaints that come from the WREFE project. We do not expect this project to adversely affect the Morrow County Sheriff's Office in terms of additional workload.

John A. Bowles

John A. Bowles, Undersheriff
Morrow County Sheriff's Office

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Attachment U-7. Record of Correspondence with Umatilla County Sherriff

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UMATILLA COUNTY SHERIFF'S OFFICE

"Conservators of the Peace"

Sheriff Terry L. Rowan

Undersheriff Jim Littlefield

June 30, 2022

To: Kristen Gulick

From: Sheriff Terry L. Rowan

Re: Wheatridge Renewable Energy East (WREFE) (NextEra)

The Umatilla County Sheriff's Office is the primary response police agency for the area in which facilities constructed through Wheatridge Renewable Energy East (WREFE) is located. Portions of the completed projects and facilities being considered for construction are also located in the Sheriff's Office patrol area. As always, my main concern would be the theft of non-ferrous metals, copper and such, typically used in the construction of these sites.

The Sheriff's Office will respond appropriately and as necessary to all reported complaints associated to criminal activity at, or around, WREFE sites located within Umatilla County.

Respectfully,

Sheriff Terry L. Rowan
Umatilla County Sheriff's Office

4700 Pioneer Place
Pendleton, OR 97801

phone 541.966.3601
fax 541.278.5496
www.co.umatilla.or.us/sheriff

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