

AGENDA ITEM FOR ADMINISTRATIVE MEETING () Discussion only
(X) Action

FROM (DEPT/ DIVISION): Planning Department

SUBJECT: West End Solar – Preliminary Application for Site Certificate

<p>Background: Oregon Department of Energy (ODOE) received a preliminary Application for Site Certificate (pASC) for the West End Solar Project. The proposed project consists of a solar photovoltaic (PV) energy generation facility with an average generating capacity of 50 megawatts (MW). Related or supporting facilities to the solar energy facility include up to 70 MW energy storage system, collector substation, switchyard substation, O&M enclosure, service roads, security fencing and gates, and construction areas. The proposed facility would be located within a site boundary of approximately 324 acres zoned Exclusive Farm Use in Umatilla County, approximately two miles southeast of the City of Hermiston.</p> <p>On December 11, 2020, EE West End Solar LLC (applicant), a subsidiary of Eurus Energy America Corporation submitted to ODOE a Request for Expedited Review for Small Capacity Facilities under OAR 345-015-0300, and on December 17, 2020 the Department notified the applicant it approved the Request for Expedited Review. The pASC was filed on November 5, 2021. Umatilla County Department of Land Use Planning, as a cooperating agency, has conducted a review of the pASC and provides the attached comment letter.</p>	<p>Requested Action: Approval of comments from County Planning Department review of pASC and authorize chair to sign</p>
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ATTACHMENTS: Umatilla County Comments – West End Solar

Date: (02/09/22) Submitted By: Robert Waldher, Director

*****For Internal Use Only*****

Checkoffs:

- () Dept. Head (copy)
- () Human Resources (copy)
- () Fiscal
- () Legal (copy)

- To be notified of Meeting:
Robert Waldher
- Needed at Meeting: Robert Waldher

Scheduled for meeting on: February 9, 2022

Action taken:

February 9, 2022

Oregon Department of Energy
Attn: Ms. Kellen Tardaewether, Senior Siting Analyst
550 Capital Street NE
Salem, OR 97301

Subject: West End Solar
Response to Preliminary Application for Site Certificate

Dear Ms. Tardaewether:

Umatilla County Planning Department staff have completed a review of the West End Solar preliminary Application for Site Certificate (pASC). We appreciate the opportunity to review the pASC and provide the following comments:

Exhibit K Land Use

UCDC 152.061(A) and (B) – Impacts to accepted farm practices and the cost thereof

- The applicant’s analysis describes that construction traffic would not interfere with harvest time activities. In this area, which farms wheat, corn, potatoes, and other row crops, the harvest season can extend 5 months. Because the analysis area for the Land Use standard extends 0.5-miles from the site boundary, the county requests that the applicant address the extent of the harvest season for all accepted farm practices within the analysis area, and then specify in a draft traffic management plan the measures to be implemented to minimize traffic impacts during harvest season.
- The applicant describes that it would implement a weed control plan during construction and operation “that will reduce the risk of weed infestation in cultivated land and the associated cost to the farmer for weed control.” The pASC does not include a draft Noxious Weed Control Plan. The County requests that the applicant provide a draft Noxious Weed Control Plan for county and ODOE review to enable review of the referenced statement, and recommends that the requirements of the plan apply both within and outside of the fenceline to minimize noxious weed impacts to surrounding agricultural practices. The plan should include monitoring, management and other best management practices including wheel washing. Teddy Orr is the Weed Department Supervisor and should be consulted on the development of the plan. His phone number is (541) 278-5462 or he can be emailed at theodore.orr@umatillacounty.net.
- The applicant does not address the potential for offsite dust or wind erosion and its potential impact to adjacent agricultural lands, including impact to perennial

crops. The county requests that the applicant identify potential dust impacts to adjacent agricultural practices and measures to reduce and control dust prior to, during and post construction.

- To further inform the extent of potential dust/wind erosion at the site, the County requests that the applicant describe its grading plan and commit to a phased grading plan, whereby grading would not occur until the applicant has verified onsite access to sufficient materials (gravel, water, tackifier) to minimize potential dust impacts to adjacent farm practices.

UCDC 152.063 – Development Standards

- Applicant states that it will comply with frontage/yard setbacks. Because this criteria is being reviewed through the EFSC process, County requests that the applicant provide a site plan that demonstrates how the facility would comply with the applicable setbacks.

UCDC 152.010 – Private Driveways

- Applicant states that the project’s proposed driveway off S. Edwards Road will conform to this provision. County requests that the access approach for the driveway be established – provide a site plan and identify materials, consistent with the provision requirements. We encourage the applicant to contact us if there are any questions.

UCDC 152.011 – Vision Clearance

- Applicant states that the Project design will conform with the vision clearance. Again, the county requests that a site plan or drawing be provided to verify that the proposed would satisfy this provision.

UCDC 152.062 Off-street Parking and Loading Requirements

- Applicant states that the parking associated with the O&M enclosure will meet the applicable design requirements in UCDC 152.562. County requests a site plan to evaluate whether applicant can satisfy the applicable provision requirements.

6.2.2 Chapter 5, Citizen Involvement

- Chapter 5 Citizen Involvement Policies 1 and 5 apply to the county and would not be considered policies that an applicant needs to demonstrate consistency. The county recommends that reference to this chapter/policies be removed from Exhibit K to avoid confusion.

Exhibit U Public Services

Section 3.3.5 Housing

- Applicant provides an analysis of potential impacts from construction to local housing supply. While there is not a specific method for this analysis, the county

strongly encourages an analysis that evaluates the likely source of construction worker housing – as a worst-case scenario. We anticipate that construction workers would likely be housed at RV parks. If that is the case, we recommend that the number of spots at RV parks be evaluated and considered within the context of any limitations on capacity and/or long-term parking. Evaluate whether this type of housing could meet the proposed facility’s construction demand or whether it would be unduly burdened, given any duration or space limitations.

Conclusion

The County appreciates the opportunity to work with the Department on review of the pASC for this proposed facility, and will likely have additional comments as we continue our review and evaluate any applicant responses to the information requested in this comment letter.

Sincerely,

John M. Shafer,
Chair
Umatilla County Board of Commissioners

CC: Doug Olsen, Umatilla County Counsel
Umatilla County Planning Commission
Tom Fellows, Umatilla County Public Works Director
Teddy Orr, Umatilla County Weed Supervisor
Anne Debbaut, DLCD Regional Representative
Hilary Foote, DLCD Farm and Forest Specialist

West End Solar



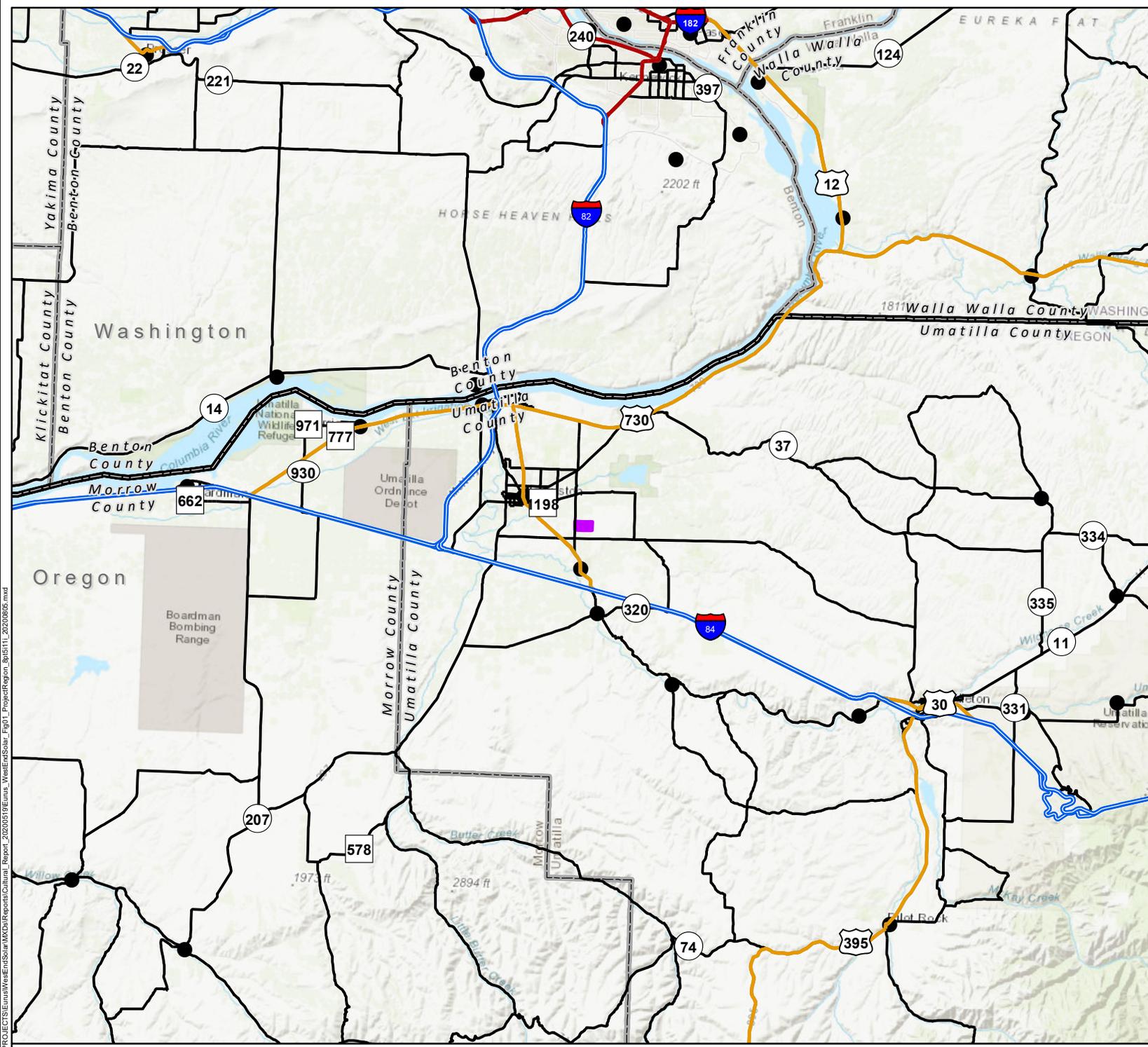
Figure 1
Regional Project Location

UMATILLA COUNTY, OR

- Site Boundary
- Interstate Highway
- Primary Highway
- Secondary Highway
- Secondary Road
- City/Town
- State Boundary
- County Boundary



Reference Map



1:500,000 WGS 1984 UTM Zone 11N

0 2.5 5 10 15 20 Miles

NOT FOR CONSTRUCTION

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West End Solar Project

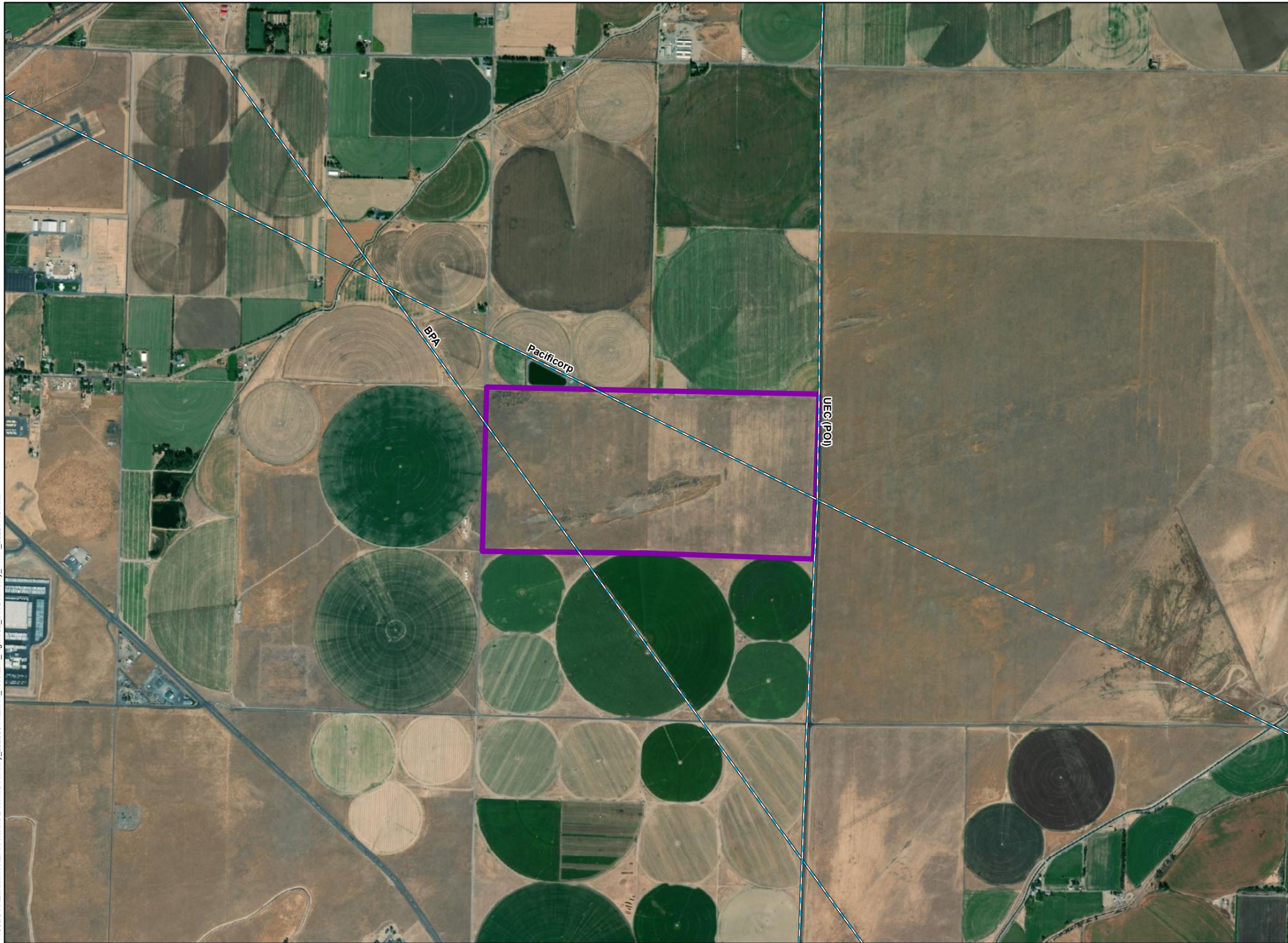
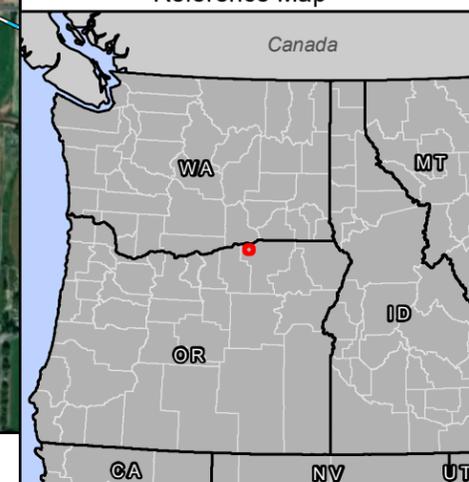
Figure 2
Site Boundary
(Micrositing Corridor)

UMATILLA COUNTY, OR

- Site Boundary (Micrositing Corridor)
- Transmission Line



Reference Map



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1:18,000 WGS 1984 UTM Zone 11N

0 200 400 800 Meters

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