

Salmonfly Solar and Energy Storage Project Assessment



**A proposal by the BrightNight Power Company
on the Warm Springs Reservation**

Table of Contents

CHAPTER 1	2
PURPOSE AND NEED FOR ACTION	2
PUBLIC REVIEW AND COMMENT	2
CHAPTER 2	3
PROJECT ALTERNATIVES	3
<i>Alternative A – No Action</i>	3
<i>Alternative B – Salmonfly Project (Proposed Action)</i>	3
CHAPTER 3	9
AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES	9
<i>Water and Soil</i>	9
Alternative A – No Action	9
Alternative-B – Proposed Action	10
<i>Fish</i>	10
Alternative A – No Action	11
Alternative-B – Proposed Action	11
<i>Wildlife</i>	11
Alternative A – No Action	13
Alternative-B – Proposed Action	14
<i>Range</i>	15
Alternative A – No Action	Error! Bookmark not defined.
Alternative-B – Proposed Action	Error! Bookmark not defined.
<i>Cultural Resources</i>	16
Alternative A – No Action	Error! Bookmark not defined.
Alternative-B – Proposed Action	Error! Bookmark not defined.
<i>Forest Vegetation</i>	19
Alternative A – No Action	Error! Bookmark not defined.
Alternative-B – Proposed Action	Error! Bookmark not defined.
<i>Transportation</i>	19
Alternative A – No Action	Error! Bookmark not defined.
Alternative-B – Proposed Action	Error! Bookmark not defined.
<i>Fire</i>	20
Alternative A – No Action	Error! Bookmark not defined.
Alternative-B – Proposed Action	Error! Bookmark not defined.
<i>Economics</i>	21
<i>Projected Employment Opportunity</i>	24
MITIGATIONS	26
<i>Water and Soil</i>	26
<i>Wildlife</i>	26
<i>Cultural Resources</i>	28
<i>Economics and Employment</i>	30
LIST OF PREPARERS	31

Executive Summary

The Salmonfly Solar and Energy Storage Project is a partnership between Warm Springs Power and Water Enterprises and BrightNight Power to build a commercial-scale solar and battery facility on Tribal land that supports Tribal sovereignty, climate goals, and long-term community benefits. The project would develop up to 250 megawatts of solar generation and up to 250 megawatts of battery storage on roughly 2,000 acres of Reservation land south of the Warm Springs community, connecting into the grid at the Tribe's 230 kV bay at Round Butte substation across the river on U.S. Forest Service land. It is designed for at least a 30-year life under a long-term lease, with an option for the Tribes to assume ownership of the facilities.

Under the Integrated Resource Management Plan, the Branch of Natural Resources and the Project Interdisciplinary Team have completed a full Project Assessment, looking at environmental, cultural, and economic implications and setting clear conditions that any approval must follow. Their work identified ways the project can protect and enhance important wildlife habitat, first-foods and cultural plant areas, and cultural resources at the proposed site and in the general vicinity. Development can only move forward if these resources are carefully avoided, buffered, or offset with meaningful restoration and monitoring.

The Project Assessment proposes a package of mitigation measures, including large-scale off-site habitat and rangeland restoration, long-term protection and enhancement of cultural plant areas, wildlife-friendly fencing and road management. It also outlines substantial community benefits including, construction employment with Tribal preference under TERO, a significant TERO fee, three to four permanent operations jobs with training support, major new lease and tax revenues for the Tribes, and long-term investments in scholarships, cultural institutions, and youth STEM learning tied to the project. With RMIDT staff recommending the Project Assessment for public review, the next step is Tribal community input and Tribal Council consideration of the lease and build permit under these conditions.

Chapter 1

Purpose and Need for Action

The BrightNight Power Company proposes an opportunity for the Tribes to exercise economic advancement in the energy industry called the Salmonfly Solar and Energy Storage Project (Project). The Tribes can build on its existing energy leadership to expand its energy infrastructure and revenues through renewable energy generation. Working collaboratively with trusted partners is necessary to respond to this opportunity as it is dependent on current regional market demands—demands that will invite competition from other participants, including other Northwest Tribes.

Need: The Reservation economy needs sustainable economic and employment opportunities.

Public Review and Comment

On December 4, 2024, BrightNight hosted a four-hour public scoping meeting at the Greeley Heights Community Center in Warm Springs. The event was attended by over 25 Tribal members and employees who participated in a comprehensive project review presentation. Attendees engaged in thoughtful, constructive dialogue with project developers, who carefully documented all feedback, questions, and concerns. The insights gathered during this meeting will play a critical role in shaping the project's direction, ensuring that the voices of community members are fully integrated into the planning and development phases of the proposed solar initiative.

Chapter 2

Project Alternatives

Alternative A – No Action

The No Action alternative results in no project which preserves unused land for the Tribe but also does not further any of the Tribes' needs listed above.

Alternative B – Salmonfly Project (Proposed Action)

Project Description

The Salmonfly Solar and Energy Storage Project (Project) proposes to construct and operate an up to 250-megawatt (MW) utility-scale photovoltaic (PV) solar and 250 MW battery energy storage (BESS) facility and all ancillary facilities required to own and operate the Project. The PV solar, BESS, collection lines, substation, O&M facilities, and transmission line will primarily be located on lands owned by the Confederated Tribes of Warm Springs, with a portion of the Project transmission line crossing U.S. Forest Service land to connect to the Project's Point of Interconnection (POI) at a Tribally-owned 230kV position at the jointly owned Round Butte Switchyard.

The Project is designed to help meet regional energy reliability and sustainability goals by providing firm, dispatchable renewable power that integrates solar generation with battery storage, ensuring grid stability and resilience in a region increasingly impacted by seasonal variability. The Project's operation over a period of at least 30 years will generate power sale revenues that will support a Tribal lease, taxes, and workforce development payments to fund critical governmental capacity needs. Additionally, the Project will provide opportunities for direct utilization of Tribal businesses in project development and construction, as well as prioritizing workforce training and employment for Tribal members.

As part of its broader community benefit initiatives, the Project aims to support Tribal goals like technical assistance for Tribal leadership to establish programs for members interested in home solar installations, resource mitigation and enhancement programs to protect local ecosystems, and structured workforce development programs that include paid internships, scholarships, and renewable energy career training for Tribal youth.

BrightNight is also committed to developing hands-on STEM learning opportunities for high school students, facilitated by industry professionals, and fostering long-term economic engagement through additional participation options for the Tribe in energy infrastructure development.

The primary components of this Project include:

- Weather monitoring equipment
- Solar PV modules mounted on a single axis tracking system
- Electrical collection systems, including PV combining switchgear, power conversion stations, inverters, transformers, collection lines, and other ancillary electric facilities
- Project substation
- Battery Energy Storage System (BESS), BESS management systems, and other ancillary BESS facilities
- A Transmission line connecting to the Pelton Round Butte Substation
- An operation and maintenance (O&M) building
- Associated civil infrastructure including fencing, roads, access driveways and gates, and on-site parking
- Stormwater management systems and signage

Site Location:

The Project site is located on The Warm Springs Reservation. It is currently undeveloped vacant land owned and regulated by the Confederated Tribes of the Warm Springs and is characterized by typical western juniper woodland and sagebrush grassland communities.

The Project is approximately 2,000 acres exclusively within Warm Springs Tribal lands on the Warm Springs Reservation. The site is approximately 11.3 miles southwest of highway 26, approximately 11 miles south of the Community of Warm Springs, approximately 11 miles west of the City of Madras, approximately 1.5 miles north of Three Rivers Marina, and within the designated boundaries of Jefferson County. Access to the Project site would be provided through Jackson Trail Road (Figure 1).

The PV modules would convert sunlight directly into electricity. Much of the site would be covered by anti-reflective PV modules mounted on single axis tracking systems. These systems move the panels to track the sun across the sky.

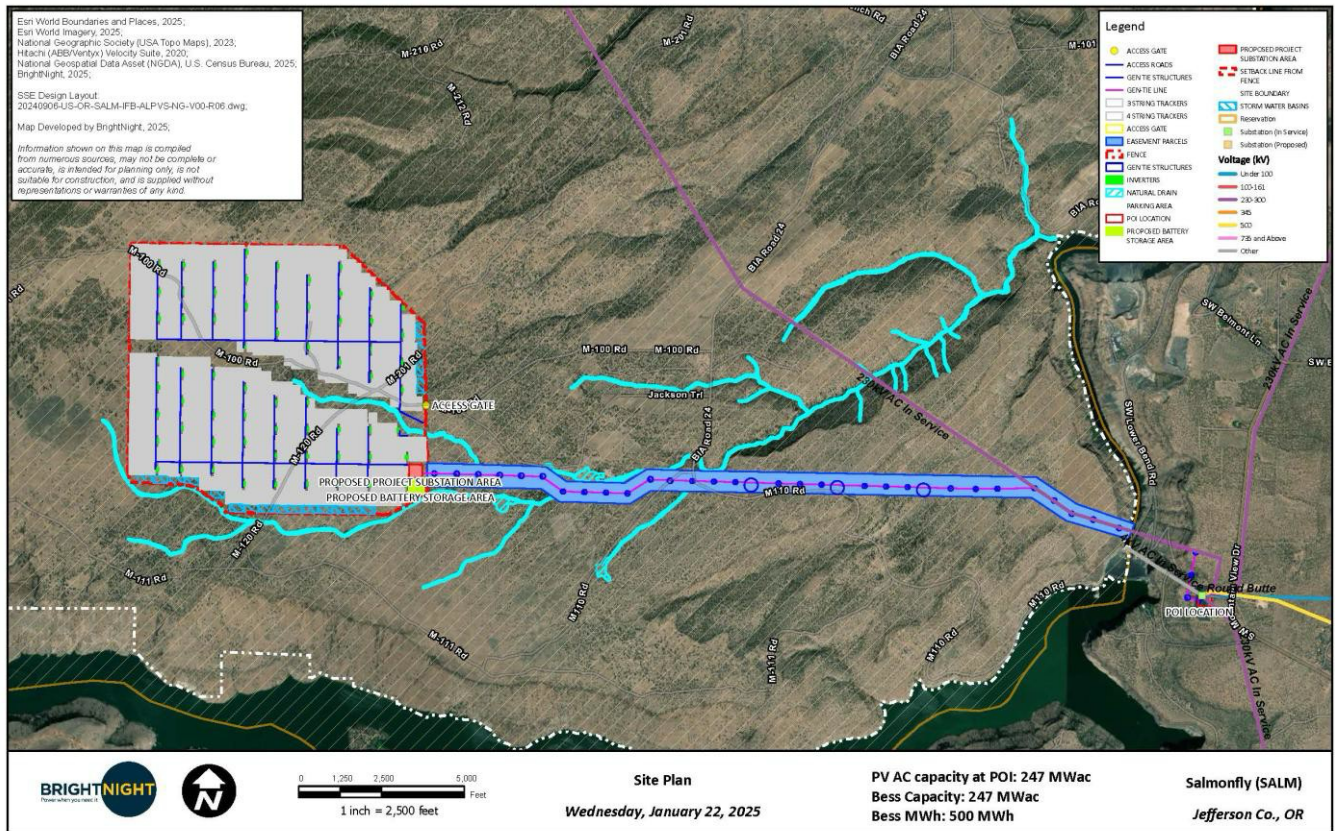


Figure 1 Salmonfly Solar Project Area and Gen-Tie Corridor.

Battery Energy Storage System (BESS):

The BESS would be designed to supply energy each day after the solar field stops generating power in the evening hours. The BESS would allow the Project to take the large amount of solar energy generated during the day and discharge the energy in the evening to meet the highest energy demand of local residents. The BESS would be housed in a series of buildings or storage containers composed of batteries and inverters (battery modules in trays that fit into racks) adjacent to the solar facility. The batteries would be controlled by a battery management system, which monitors both their condition and performance and allows for facility control. The facility would be monitored 24 hours a day, 7 days a week.

Electrical Collection System, Project Substation, and Transmission Line:

The energy generated by the solar arrays would be routed to power conversion stations via a direct current (DC) collection system of underground DC cabling and combiner boxes. From the power conversion station locations, the generated power would flow through a medium voltage (34.5-kilovolt [kV]) collection system to the project substation that would include a voltage step-up transformer, breakers, other associated substation equipment, meteorological stations, and telecommunications equipment. At the Project substation, the voltage would be increased to

230kV, which would then be transmitted through a newly constructed, approximately 4-mile 230kV Project transmission line to the Tribe's 230 kV bus at the Round Butte Substation, the Project's POI. From there, the energy travels into the electrical grid where it can be dispatched to utility customers, both on and off the Reservation.

O&M Facilities:

In addition to the infrastructure associated with the PV and energy storage facilities, the Project will include an O&M building and control house adjacent to the Project substation or a location off-site depending on feasibility. The O&M building would house maintenance staff workspace, equipment, and documents, while the control house would store protective relay and communications equipment. Final employment figures are still in development, however early indications suggest the Project could generate three to four full and part-time positions. During Project operation, the primary source of water use would be for occasional washing of the solar panels. Water for operational needs could be provided by a well pending needs and site conditions. Alternatively, water could be hauled to the site and stored in water tanks.

Access Roads:

Access roads associated with the Project would be designed to incorporate existing roads. The main site access road, Horse Trap Rd. (M-100 Rd.) would be graded and graveled to approximately 24 feet wide, facilitating two-way construction traffic to the Project site. Soil, slopes, and drainage will be evaluated to ensure proper grading and stabilization of the roads for use both during and after construction.

BrightNight contracted Atlas Pathfinder ("APF") to perform a road survey starting at the intersection of Highway 26 and Jackson Trail Road and continuing to the Project site. The scope of work entailed evaluating the conditions of the existing road in correlation to the expected loads that will travel on this road for the construction of this proposed solar farm. The components analyzed for delivery on this route consist of solar panels (containerized loads), construction equipment (similar clearing profile to a container) and a transformer (super-load). This road survey identified areas of temporary road improvement that could be required to deliver Project components, and the Project team will coordinate with the BIA Roads Department and the Branch of Natural Resources (BNR) prior to construction to ensure any improvements areas are surveyed and improved prior to any deliveries occurring. During construction, the Project will ensure that all roads utilized are maintained free of debris and any repairs are done in a timely manner and in accordance with all Warm Springs Integrated Resource Management Plan (IRMP) requirements. A traffic analysis will be conducted to determine additional traffic caused by operations of the Project, however, it is anticipated that traffic increase will be minimal as maintenance and operations will require minor trips.

Fire Protection:

The Project would be designed to minimize and mitigate any fire risk, and will be compliant with all relevant building codes, incorporating all necessary fire protection systems to ensure public safety and minimize risk of fire. A fire prevention and protection plan will be developed for all elements of the Project including access, PV and batteries, for approval by the Confederated Tribe of Warm Springs. The Project site would be routinely maintained and kept clear of any vegetation that could pose a fire risk. A fire response plan will be developed in coordination with CTWS Emergency Services, and the Project team will ensure Emergency Services has access to all areas of the site.

Fencing:

The Project would be designed with appropriate fencing to enclose the Project facilities, especially the Project substation and any high-voltage equipment, ensuring the safety of any community who may enter the area. Fencing would be installed along Project boundaries and designed in accordance with BNR requirements and any relevant federal regulations for energy facilities. Fencing designs will be appropriate for wildlife protections as well as enabling wildlife migrations including the mule deer winter range.

Lighting:

Lighting would be designed to provide the minimum illumination necessary to achieve safety and security objectives and minimize potential impacts to wildlife and surrounding resources. Lighting would be directed downward to focus illumination on the desired areas only. To eliminate light pollution to surrounding areas, there would be no lighting in the solar field. Lighting needed for night maintenance will be on motion sensing switches to eliminate light pollution when no one is on site.

Method of Implementing the Project

Once the required Tribal permits and approvals have been secured, Project engineering, procurement, and construction (EPC) would commence. A reputable EPC contractor specializing in renewable energy construction will prepare the site and install and manage construction of all Project infrastructure. A grading plan will be included and submitted for tribal approval. The site was selected to avoid the need for major grading, and as such, minimal disturbance is anticipated. In areas where grading may be required, the soil surface would be smoothed with the minimal amount of disturbance required, and restored with native vegetation as needed. Solar arrays will be placed on piles driven, drilled, or screwed into the ground at uniform spacing, which results in less grading of the site required. Some areas may require compaction to place battery foundations, access roads, and other infrastructure requiring flat/level/compacted surfaces.

Temporary erosion and sediment control measures will be used during construction, and

permanent stormwater management features will be used during facility operation. An erosion and sediment control plan will be developed with commencement of surveys and geotechnical work. Temporary facilities could include sediment traps or basins, geotextile silt fences, and straw bale check dams in ditches. Permanent facilities could include culverts, ditches, and/or stormwater basins. The site drainage plan would be in accordance with all tribal requirements as well as any necessary local and state guidelines.

Upon completion of construction, operations and maintenance would commence. It is expected that approximately three to four full-time and part-time employees would be on site to ensure proper operation of the Project (likely one Site Manager and two to three technicians). Employees will office at the proposed O&M facility on site or a combination of other offsite options still TBD.

Ground Disturbance

Preliminary Project disturbance will be calculated when the Project boundary is finalized and engineering and design is completed. Ground disturbance will be calculated based on topography, soil types, and any areas that require avoidance. The Project will do everything to minimize ground disturbance and reduce any potential impacts to sensitive resources. If impacts arise from ground disturbance, the Project will work with the Tribes and the BNR to properly minimize and mitigate those impacts.

Projected Timeline of Implementation

Once permitting is completed through the IRMP process, the expected timeline to implement the construction of the Project is approximately 18 months, depending on site and weather conditions. The Project desires to reach commercial operation by December 31, 2027, and a list of Project milestones is provided below (Table 1).

Salmonfly Development Schedule	
Interconnection Agreement Executed	Q3 - 2025
Land Permissions Acquired	Q4 - 2025
Natural Resource Surveys Performed	Q4 - 2025
Permitting Completion	Q4 - 2025
Site Engineering/Design Completion	Q2 - 2026
Start of Construction (Notice to Proceed)	Q3 - 2026
Commercial Operation Date (COD)	Q4 - 2027

Table 1. Project Schedule with Major Milestones

Chapter 3

Affected Environment and Environmental Consequences

Water and Soil

This project is contained within the Seekseequa Creek-Deschutes River Watershed and has area within both the Lake Simtustus-Deschutes River and Box Canyon sub-watersheds. Those sub-watersheds are 12038 and 16688 acres respectively. The project site contains ephemeral streams and drainage that drain into the Deschutes River and Box Canyon Creek. The Gen-Tie line will cross the Deschutes River/Lake Simtustus near the Round Butte Dam. With the exception of the canyon containing the Deschutes River, there is limited elevation change across the parts of the watersheds affected by this project.

Soil characteristics and definitions are obtained from Natural Resource Conservation Service (NRCS) Soil Survey data. The vast majority of the soils in the proposed project area are a combination of Watama and Rockly soil series with some Shiva and Dryhollow series on the Northwest and Northeast edges, respectively. All of these soil types have the potential to be a very shallow to moderately deep silt loam with an influential clay component and can be very rocky in places. The Watama and Rockly soils were formed in loess and colluvium from basalt, while the Shiva and Dryhollow are formed in residuum and colluvium derived dominantly from volcanic ash and pumice. Water permeability is moderate to slow across the landscape, meaning that water will move into the soil slowly. This creates more surface runoff that collects in topographically lower places on the landscape. These soils are considered Well Drained meaning that water will move through the soil profile eventually and without prolonged residency in the soil profile. The clay component of the soils does indicate that this movement could take time, leading to runoff during rain events and those low areas having surface water for extended periods of time. Runoff channels have been created on the landscape leading to many prolonged wet areas. These wet areas are especially evident along and across the roads. The slow permeability and soil water holding capacity creates conditions for the soils to easily become compacted on site, resulting in damage to the soil as well as access issues around the site in the wet seasons and after precipitation events.

Alternative A – No Action

No Action. Soil resources will continue to persist in their present state of development and characteristic, effected by the current disturbance regime that includes native, invasive, and encroaching plant species, domestic and wild animal activity, and human activities.

Alternative-B – Proposed Action

Introducing disturbance on the landscape always has the chance of leaving long lasting effects, and construction projects such as this one, have the potential to take that to the next level, leaving expensive or functionally irreversible damage in its place. The impact starts with the soil compaction during the time of construction. Large vehicles and other equipment move and compact the soil and damage the vegetation as they move around the landscape. Compaction is the action of putting soil under pressure, pushing soil particles closer increasing the density. The increased density leaves less room for roots or water to move through soil limiting the reestablishment of plant species on the site, slows water infiltration into the soil, and increasing runoff during and after precipitation events. The clay and silt loam textures in the soils on this site exacerbate this as they are on the smaller end of particle sizes to begin with, meaning that there is relatively less pore space even in undisturbed areas compared to the other soil textures.

The reduction of the rate and depth water can soak into the soil will increase the amount of water sitting/moving on the surface. The compaction along with road improvements and other topographical changes will change the flow of water on and around the site. These soils hold on to water in the first few inches for a long period of time leading to wet ground that can be further compacted and rutted when traveled on under these conditions. After installation of the panels, precipitation that falls on the panels will runoff and be concentrated on the ground around the panels, potentially creating soil erosion, or channeling, and other surface impacts.

Fish

There are no known fish populations within the project area. All waterways within and around the project area are ephemeral creeks that drain runoff into the Deschutes River during large rain and/or snowmelt events. The Deschutes River lies to the east of the project area, while the Metolius River arm of Lake Billy Chinook lies to the south of the project area. Both major rivers have already been heavily modified through the construction of the Pelton Round Butte Regulating Dam. Per the CTWS Integrated Resources Management Plan (IRMP), all natural drainages highlighted in the teal blue layer in Figure 1 are considered Class III Streams. Per the IRMP, these streams should be given 30-foot Zone A buffer and 30-foot Zone B buffer (i.e., 60-foot total) zones on each bank. No project-related construction activities should occur within Zone A buffer zones. Zone B buffer zones should be minimally impacted by construction activities such that a minimum of 60% of canopy cover and 90% of ground vegetation cover (i.e., shrubs, sedges, and grasses) are maintained.

Alternative A – No Action

Under Alternative A, no action would occur.

Alternative-B – Proposed Action

Provided that these stipulations from the IRMP are met, there are no additional concerns regarding impacts to fisheries resources from the proposed project.

Wildlife

The Project area is known to be used by many wildlife species. Mule deer and Rocky Mountain elk are two important subsistence species for Tribal Members, and are commonly found within the southern boundaries of the Reservation on the Metolius Bench. Spotted owls, black bears, wolves, mountain lions, bobcats, grouse and many other non-game species such as raptors, mesocarnivores, rodents, and small mammals also inhabit these areas. All wildlife species require from habitat that is conducive to their life history needs; forage, cover, water, and space in varying assemblages based on species' niche or seasonality. The Project area primarily encompasses Sagebrush steppe communities, as well as historic and expanding western juniper woodland. Multiple sagebrush species, rabbitbrush, bitterbrush, and even young ponderosa pine are fairly common to abundant throughout the Project area. While a heavy invasive annual component exists within the understory, many native bunchgrass communities containing intact native forb and forb-like plant species are present throughout the Project footprint. Further vegetative sampling can help further delineate abundance of each community. The plateau landforms situated above the Deschutes confluence and Metolius River serve as key migratory pathways for many animals and serve as suitable habitat throughout the year.

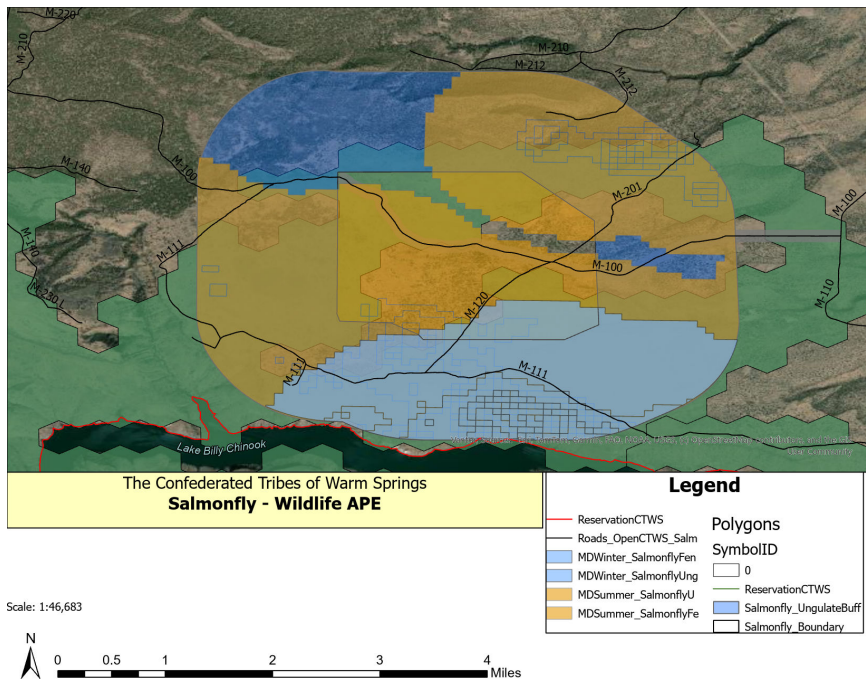


Figure 2 Wildlife Considerations Within Project APE

Year to year observation and various modelling efforts have shown that habitat is one of the strongest limiting factors for many species, but most exemplified by mule deer populations on the Warm Springs Reservation. Disturbance factors from human activity, from resource extraction, recreation, grazing, road construction, fences, fire suppression, and non-native invasive species encroachment contribute to these altered habitats and can further reduce their availability on the landscape. Loss of associated habitats from these disturbance factors, as well as others, continue to cause

downward population trends of mule deer within the Metolius Bench and surrounding areas. Natural disturbances such as fire, insect and disease outbreaks, floods, extreme weather events, and other climate variability have played a significant role in shaping and shifting these habitats and ecosystems and can cause additional stressors on mule deer herds persisting through additional human caused disturbances.

Wildlife Management Zones (WMZs) were created through the IRMP processes to “emphasize healthy management of vegetation for deer and elk benefit”. Specific temporal and spatial habitat management restrictions apply to projects within WMZs to attain goals set forth by IRMP. While WMZs emphasize vegetation management for the benefit of deer and elk, many other species benefit from restrictions and intact cover in WMZ’s from focused vegetative treatments. The Pelton and Box Canyon WMZs are two designated through the IRMP for this area. A total of 61.53% of the primary fenced project area occurs within these two WMZs, specifically the Pelton WMZ. The entirety of the transmission line footprint and associated road modifications occur within the Pelton WMZ. Development and disturbance within WMZs may cause fragmentation of their continuity and

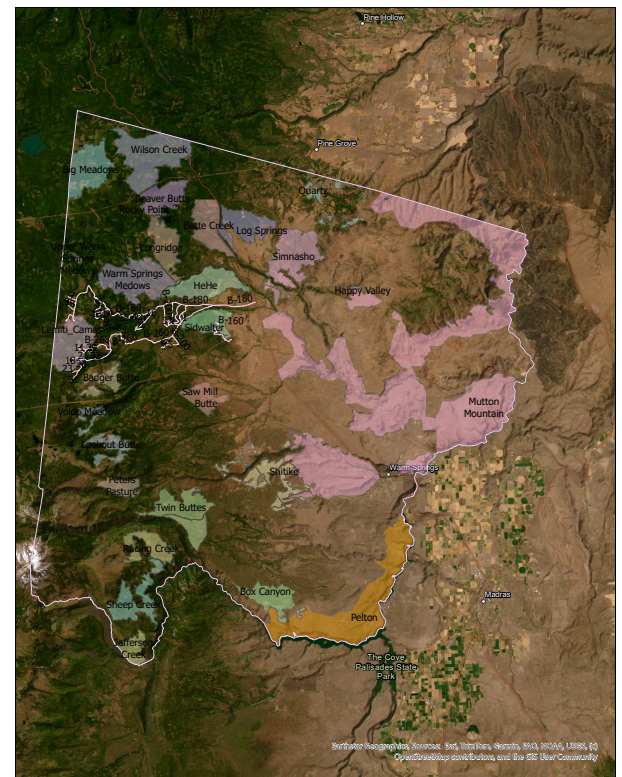


Figure 3 Tribal Wildlife Management Zones

impact existing intact native plant communities utilized by wildlife species for forage and cover.

IRMP requires that cover to forage ratios in WMZs consist of 40% cover (10% thermal & 30% hiding) to 60% forage. Hiding cover is defined within IRMP as vegetation that would hide 90% of a standing deer at 200 feet or less. Thermal cover offers unique microclimate that is warmer during the cold and severe cold weather periods and can provide adequate shading during warm weather periods. This provides many species with potential habitat use beyond ungulate needs. This cooling effect can also help to maintain moisture in soils around these thermal cover areas that provide more palatable forage production. This is of particular note within the Project area, as it consists predominantly of both summer and winter range with associated transition zones for spring and fall movement. Anecdotal observations, past telemetry studies, and year-to-year inventory surveys indicate usage of the Metolius Bench for what these habitats can provide. From western juniper woodlands to some of the remaining intact sagebrush steppe communities on the Warm Springs Reservation, these habitats still provide the necessary thermal coverage and winter forage necessary to survive our variable winters. Grass and forb components are necessary for spring green up and nutritious summer forage for fawn and calf recruitment and survival. These vegetated areas also provide significant hiding cover.

Seasonal restrictions limit operations in these delineated critical seasonal ranges. Activities that would disturb wildlife in winter are of particular concern. Excess disturbance increases the caloric toll that winter already takes on big game species and potentially further reduce body composition and over-winter survival, as well as the following year's fawn recruitment. Project implementation must consider seasonality for consistency with IRMP standards to reduce disturbance of wildlife species, particularly during winter.

Roads are a significant contributor to the level of habitat fragmentation currently seen on the Warm Springs Reservation. Roads divide large landscapes into smaller patches and convert interior habitat into edge habitat. Habitat connectivity modeling efforts in Central Oregon show that roads exert a zone of influence that can create avoidance buffers more than 622 meters from the middle of the road prism. This scales based off of usage and road type. When combined, associated soil compaction and invasive channel vector can impact native plant communities. Impacts to plant communities can alter grazing scale and intensity. Roads and compaction affect the hydrology of these landscapes to the degree that these habitats are altered, or their effectiveness is reduced. Paired with the direct impacts +6 of fragmentation caused by road construction and use, these indirect impacts on plant communities cause continued habitat fragmentation beyond the roadbed. Current road densities within the Project area are approximately 0.825 miles per section. Per IRMP standards, the average open road densities in IRMP designated WMZs shall not exceed 2.0 miles per section. By maintaining low road densities, proposed projects will reduce habitat loss, fragmentation, and human disturbance factors on wildlife populations sensitive to disturbance.

Alternative A – No Action

Alternative A would not affect wildlife resources within the Project area, because no changes to the current condition and management of the area are proposed.

Alternative-B – Proposed Action

Alternative B would include 1,583 acres of fenced in area for solar production, four miles of expanded roadway potentially resulting in 22 acres of ground disturbed with widened & graveled roadway, and approximately four miles of new transmission tie-in line that requires an approximate 300 ft ROW, and potentially affects an additional 202 acres of ground due to required clearance and maintenance. Potential impacts to ecological functions and values would be high, as many of these ecosystems are becoming increasingly rarer, increasing the difficulty of avoiding or mitigating those impacts.

This alternative would fence off approximately 1,583 acres of prime seasonal range as delineated by our resource selection modelling and annual survey observations. This area is also encapsulated by Oregon Connectivity Assessment Mapping Project (OCAMP) Priority Wildlife Connectivity Areas (PWCA). It is critical to think of PWCAs as modeled areas that have sufficient linkages to facilitate for Oregon Conservation Strategy species movement year-round. Only 56 acres of the fenced-in Project area is not encapsulated in one or multiple of these delineated habitat areas. Fencing is one permanent Project associated impact that is not easily avoided or mitigated in combination with USSE production. These habitats are categorized as irreplaceable habitats.

Over one thousand acres of fencing can create landscape level impacts to connectivity corridors and impacts to resident, migratory, and locally rare and culturally significant species or special status species, such as mule deer, elk, golden eagles, etc. Research around USSE fenced installations on ungulates show an indirect potential avoidance effect at one, two, and three km bands around USSE installations, expanding the impact beyond the panel arrays, fencing, road construction and tie-in lines. Because of the uncertainty around this context, we've utilized a conservative 1.5 km impact buffer for this project beyond which the indirect avoidance effect tapers off at five years post construction. It expands the footprint of disturbance to nearly 7,000 acres. This includes nearly 3,000 acres of WMZ impacts to Box Canyon and Pelton, as well as nearly 4,105 acres of PWCA habitat affected. This results in a significant potential loss of critical habitat necessary for population maintenance for large ungulates, and it is uncertain if this could destabilize herd population and range within these Metolius herds. Design mitigations can help reduce associated impacts on other wildlife species, such as small mammals, reptile, and avian species.

Beyond fences, construction and road expansion present a significant human disturbance, which can be exacerbated depending on the time of year of activity. The visual and sound disturbance can trigger flight behavior in species, leading to direct or indirect mortality as a result of collisions, flight behavior leading to injury, or pushing animals into habitat that exposes them to hunting or predation. Lights can become a detriment to surrounding habitat quality, as the increase in visibility could decrease usage by animals within the associated project impact areas.

Paneling, construction, pole placement, and grading, can increase shading effects on species, which could deleteriously affect species that are shade intolerant. Many significant shrub species important for winter range, such as sagebrush and bitterbrush are shade intolerant, and do not do well without full sun. This is further exacerbated by mowing to reduce shrub component below panel height.

The increase in both road development and maintenance, as well as vehicle use within the Project area increases the opportunity for invasive species encroachment throughout the project area, especially in disturbed areas from road construction, panel installation, canopy clearing, or associated mowing. Due to the volatility in which precipitation moves through the area, it is important to consider run-off potential, as soils within the Project area are known to be susceptible to erosion, which can further exacerbate habitat loss and invasive encroachment. Panels also have the potential to channel waters in ways that can lead to large scale pooling and surface run-off.

While interior site placement of panels can vary, USSE in confined footprint can lead to numbers of panels that can create what is known as lake effect. The proximity of the panels to one another and the associated glare gives off the appearance to migratory birds of that of a body of water. This can lead to indirect collisions, confusion, or predation from taking these animals off course.

It is important to consider many of these impacts in the time, scale, and effect on which they will have on resources within the project area. Many impacts, such as roads, O&M, inverters, substations, posts, and/or fencing should be considered as “permanent,” due to the nature of these things remaining static through the life of the project. This expands to a minimum of 30 years and could stretch potentially longer depending on the scale or difficulty of reclamation.

Range

The rangeland condition for the Salmonfly project area is rated as *fair to poor* due to the dominance of the invasive annual grasses medusahead rye (*Taeniatherum medusa*), cheatgrass (*Bromus tectorum*) and ventenata (*Ventenata dubia*), species that are perpetuated by shortened fire cycles and years of overgrazing of native plant communities by unmanaged horses and livestock. As annual grasses become dominant, native forbs and grass species are unable to capture available water and nutrients. Consequently, they disappear from the landscape as the land is transformed to a monoculture, devoid of the biodiversity needed to support a rich variety of fauna. Tribally significant cultural plants are adversely impacted as well, and over time will lose the ability to compete for available water and nutrients. A preliminary Plant Inventory captured wild celery (*Lomatium nudicaule*) and biscuit root (*Lomatium cous*), however, a thorough Plant Inventory survey will be conducted before project implementation and may lead to more sensitive and/or culturally significant plant discoveries within project area.

This location is of cultural significance to the Tribes as an area utilized prominently for first-food collection. While there are still appreciable populations of culturally significant plants outside the project area, protecting this site from further degradation is a priority. Bitterbrush (*Purshia tridentata*), important for wildlife cover and forage, and some native bunchgrasses, including Sandberg bluegrass (*Poa secunda*), are also present, although many groupings appear to be stressed and decadent due to livestock and horse grazing pressure.

Even though invasive annual grasses are currently the dominant vegetation, the rangeland overstory is primarily composed of juniper (*Juniperus occidentalis*). The understory vegetation has become severely compromised as shrubs are the first to die off, followed by deep-rooted bunchgrasses, and then shallower-rooted forbs and grasses. What little soil stability and habitat annual grasses afford, they still provide more biodiversity, forage, and water availability than a juniper-dominated site with little to no understory vegetation.

The project is located within the Metolius grazing district, which has a total production of 51,916,803 pounds (lbs). Specifically, the Salmonfly project area contributes 1,576,000 lbs of production for livestock and horses, translating to 1,970 Animal Unit Months (AUMs) within the proposed project area. While there are no natural springs in the project area, there is a solar pump/well water site. The pump is currently inactive, but can be repaired for future use. These developed systems ensure clean water is available for wildlife, livestock, horses, and avian species.

Alternative A

No action. Invasive annual grasses will continue to dominate and junipers will become pole sized trees. These combined factors will continue to degrade native vegetation viability, further reducing biodiversity. However, cultural plants may persist in rocky outcrops where populations are holding on.

Alternative B

Proposed actions will directly impact resources and preservation of culturally significant plants, wildlife, and livestock.

This project will result in habitat loss and fragmentation. The clearing of land, and grading of slopes, will destroy native vegetation. This may displace wildlife, resulting in disruption in migration routes, forage sources, and shelter. The clearing of vegetation and removal of trees will also cause soil compaction, increase erosion, and reduce soil fertility during the lifetime of the project and into the foreseeable future. This may make it difficult for native plants to establish at this site post-project.

Solar panels will also alter the microclimate, changing local temperature, humidity, and wind patterns. This may lead to reduced rainfall, and snow absorption during precipitation events. However, these microclimates from shade may increase water availability in the soil by reducing soil temperatures underneath panels and reducing evapotranspiration. Restoration treatments under panels may not be effective due to the shift in shade, temperature, soil humidity, and available water. If extensive Plant Inventory surveys discover locally rare & culturally significant plants, polygons for areas of avoidance may be added. The process of building the solar facility may lead to bare and disturbed soil, resulting in favorable conditions for noxious weeds. This area already has medusahead, cheatgrass, and ventenata, therefore, any ground disturbance may exacerbate the issue. The Warm Springs Noxious Weed Plan will be referenced and followed. The construction of Salmonfly will take this land out of production for grazers for the life of the project. While there are a lot of unmanaged horses and cattle in the area, there are still managed livestock in this area.

Cumulative Effects:

- Altered microclimate
- Loss of biodiversity
- Soil erosion
- Habitat fragmentation
- Invasive species

Cultural Resources

A review of Cultural Resource Department (CRD) records has identified three prior cultural resource inventories within the Salmonfly Project area. These inventories have identified a total of 20 archaeological sites and isolates within the project. Recent inventories have identified known sites and isolates, including lithic scatters, isolated lithics, historic artifact scatters, Indian Allotments, isolated historic artifact scatters, and historic artifact scatter. There are two known sites (Indian Allotment, Klamath Trail) identified within the proposed Salmonfly Project area.

An approximate route of the Klamath Trail runs directly through the project area. The Klamath Trail is a known trade route that travels North-South across the Reservation. It was the Indian trade route the Tribes used to travel from Klamath Marsh to the Columbia River fishing grounds in present day The Dalles, Oregon. It has been used by tribes in their seasonal migrations to and from the fishing grounds, and seasonal gathering areas. It is mentioned in early explorers' journals as a well-defined trail. It was followed in part by every explorer who traveled through this area (Nathaniel Wyeth, Peter Skene Ogden, John C. Fremont, and Pacific Railroad).

Cultural resources within the project have been variably affected in the past by ground disturbing activities like wildfire, and associated management and suppression activities. Cultural resources should be protected, preserved, and managed in a manner consistent with Tribal Ordinance 68, Chapter 490 (Protection and Management of Archaeological Historical and Cultural Resources); Tribal Ordinance 74 (Integrated Resources Management Plan); and Section 106 of the National Historic Preservation Act of 1966 (as amended).

Previous surveys and documentation have also noted a significant number of cultural plants. These include, but are not limited to Canby's biscuit root, cous, bitterroot, camas, Indian carrot, yellow bells, wild onion, Indian celery, and wild rose. Site visits with tribal members, and Culture & Heritage committee members have stated that the project area is a known gathering area for tribal food gatherers. Some even stated that they gather for the Root feast in the project area.

Geovisions, an enterprise wholly owned by the Confederated Tribes of Warm Springs, was contracted by BrightNight to conduct a cultural resource inventory, a cultural plant survey of the project area to identify cultural plant environments, new archaeological resources, updated known archaeological resources, and buffer known sites for protection prior to any ground disturbing activity. A portion of the APE was surveyed for cultural plants in late June of 2025. In spring of 2026, Geovisions will finish the survey of the APE for the cultural plant survey in areas not covered during the first survey. The cultural resource inventory survey was completed late June through the beginning of August 2025. The full APE, a total of 1900 acres, were surveyed. During the cultural resource inventory, a total of 21 sites and three isolates were documented. BrightNight will be conducting geotechnical boring 9/24/2025 through 10/3/2025. They will have an archaeological monitor on-site during construction activities and ensure that boring locations are outside of all avoidance areas identified during the cultural resource inventory and cultural plant survey. All avoidance areas include a 30-meter buffer to ensure that these resources are protected. Geovisions will be providing a monitoring report to the THPO within 30 days after the completion of geotechnical borings summarizing construction activities, the monitor on-site, and subsurface resources encountered (if any). Geovisions has the cultural resources survey report in progress, with the goal of providing a draft report to the THPO on November 21, 2025. Geovisions will be providing a presentation to the Culture & Heritage committee on October 1st, 2025 with a project update and a request for direction on completing the oral history interview portion of this project. In Geovisions scope of work BrightNight, they are to complete up to 10 oral history interviews with knowledgeable elders.

Alternative A

Alternative A would not alter the level of current impact to cultural resources, because no changes to the current condition and management of the area are proposed.

Alternative B

A review of CRD files indicates there are two known archaeological resources within the project APE. The Project area has either has not been surveyed, or surveys completed within the Project area fail to meet current THPO/CRD standards. In addition, any roads and staging areas utilized or constructed by the Project or recommendations made to the Project, must be inventoried, should this alternative be implemented. A cultural resource inventory, oral history interviews with knowledge keepers, and cultural plant survey of the entire Project area is required prior to Project implementation. Consultation with Culture & Heritage Committee and other knowledge keepers should be conducted, in order to identify areas within the Project that have the highest probability for containing important cultural resources. Geovisions are to complete up to 10 oral history interviews with knowledgeable elders to identify historic properties culturally significant to the Indian Tribes within the project area.

Culturally significant plants may be identified within the Project area. Some culturally significant plants are only identifiable seasonally. A botanical cultural plant survey to identify these plants should be completed prior to project implementation in the spring, or during periods of time when they are flowering or fruiting to increase their ability to be identified. Monitoring of the Project's effectiveness at avoiding or mitigating should include monitoring for species biodiversity to consider and evaluate ecosystem health. Whenever possible, project methods should be utilized that minimize negative impacts to cultural plants. This may include limiting the implementation phase to specific times of year when plants are flowering or fruiting, selective placement of access trails, roads and staging areas where there are gaps in cultural plant distribution, and avoidance of piling of vegetation debris within cultural plant areas. Any juniper felled within cultural plant gathering areas will not be piled and should not be bucked to avoid impacts to Tribal members gathering cultural plants.

It is standard operating procedure for construction crews to avoid or mitigate impacts to significant cultural resources in accordance with IRMP and BMPs. Cultural resources will be buffered during the inventory prior to implementation of the Project. Any cultural resources that cannot be avoided will be mitigated for on a case-by-case basis. This includes cultural plants, which may require additional protective mitigation measures for future management of the resource. Specific conditions and general recommendations are included within the *Mitigations* section of the document.

Cumulative Effects

Cultural resources within the Project have been variably affected by natural processes that include wildfire, erosion, and weathering. Management practices that have affected cultural resources include fire suppression efforts, road building, and livestock grazing. Cultural resources are a finite resource, and it should be noted that without thoughtful consideration of avoidance and other mitigation measures, the proposed Project activities have the potential to adversely affect (to the point of destruction) most of the cultural resource types known to exist (or likely to exist) within the Project footprint. Using IRMP standards complete the following procedures before proposed project is implemented.

Forest Vegetation

This project area covers about 1,939 acres within the range land and is not within the commercial forest base. The main species of coniferous trees within this project area is Western Juniper. Western juniper has historically been on the landscape but has dramatically increased in abundance and extent throughout central Oregon Sagebrush Communities since the late 1800s (United States Department of Agriculture, 2008). Western Juniper is noncommercial and does not affect timber.

Alternative A

Not likely to adversely affect.

Alternative B

Not likely to adversely affect.

Transportation

The current road conditions to the project area vary from good to poor (a condition more prevalent when native surfaces roads are wet). BIA Route 24 Jackson trail (aka, P-100 and M- 100) and BIA Route 27 Horse Trap Trail (aka, M-100) roads provide the primary access into the sale area. Approximately 13 miles of BIA Route 24 is a paved surface road in good condition, and approximately 1.4 miles is aggregate surface also in good condition. Approximately 3 miles of BIA Route 27 is a native surface road in poor condition.

Alternative A

Alternative A would provide for improved surface conditions on those roads necessary for necessary travel.

Alternative B

This alternative would include an objective to upgrade the primary access routes while protecting other resources. There would be no new 'travel' road construction proposed under this alternative. New constructed roads will be within project area to access solar panels. Miles of reconstruction to access the Salmonfly project is approximately 3.0 miles. Maintenance activities would be performed on 4.1 miles of road under this alternative. Miles of road include the unpaved access to the project area and any unforeseen damage done to the paved

section of BIA Route 24

Up to 4.1 miles of road would be surfaced with aggregate to allow access to the project area

Approximately 3 miles of road will be reconstructed and widened to accommodate large trucks to and from the project area.

Five corners along BIA Route 24 would need to be widened to allow trucks access to the project area. A BIA area office engineer consultation may be required before these upgrades are performed

Operational dust abatement will be required during stages of heavy traffic on the gravel surface sections of BIA Routes 24 and 27.

Fire

Analysis of the Bright Night Solar Project area utilizes the Interagency Fuels Treatment Decision Support System (IFTDSS) to analyze the associated landscape features and report wildland fire behavior characteristics within the project boundary. IFTDSS incorporates a plethora of fire and fuels software programs to analyze and compute fuels and atmospheric elements to model fire behavior at the 97th percentile conditions within the specified area. The analysis is focused on the project area and reports the analyzed elements in each category numerically using the metric system providing ratios in percentages across the project area. It's important to note that the landscape attributes that exist across the project area vary spatially in continuity and are not always continuous across the project area.

landscape baseline elements

The Bright Night Solar Project area is within the reservation range land area with elevations ranging from 2,600 to 3,000 ft. 96 percent of the project area exhibits slopes that range from 0-5 degrees and primarily flat. Slope aspects are South facing and generally flat. Grass fuel models are dominant with Grass (GR) 1 and 2 distributed throughout. GR1 (Short, sparse dry climate grass), GR2 (low load, dry climate grass coupled with GR1 (low load, dry climate grass-shrub) make up the majority of the fuel models present. Canopy cover percentages are 0% due to the area being non-forested. The project area is mainly within fire regime condition class II, moderately departed from historical conditions.

Topographic and fuels condition's

South and South East aspects angled at 0-5 degrees experience early and consistent solar heating daily and at a longer duration during the summer months. This rangeland area consists of native grasses and shrubs intermixed with annual and perennial invasive grasses and shrubs that contribute to an increased fuel continuity, hazardous arrangement and higher fuel load that isn't normal when compared to historical fuels conditions. Grass fuel models experience high moisture extinction hourly while shrub fuel models experience moisture extinctions at a 10-hour average depending on the fuel size class. Fuel loads within the grass fuel models average 1.0 tons per acre (t/ac) while the grass shrub fuel models exhibit 2.5 t/ac. Do to increased grass and shrub invasives intermixed with native species, fuel load, arrangement, and continuity is unlike its historical conditions allowing the area to fall within a Fire regime and condition class of 2, moderately departed from historical conditions.

Fire behavior

Fire modeling is based on the 97th percentile conditions which generally means “worst case scenario” related primarily to fuel moistures live and dead as a result of the climactic and landscape conditions analyzed together. Local remote automated weather station(s) (RAWS) compile weather data and compute daily data to generate elemental averages while identifying the time and duration of the elements that contribute to the energy release that predicts wildfire likelihood and intensity. The elements accounted for describe the 97th percentile conditions in the project area and are as follows:

Wind type – Gridded	Foliar Moisture – 100%	100 Hour Fuel Moisture – 12%
Wind Speed – 10 Mph	1 hour Fuel Moisture – 9%	Herb Fuel Moisture – 80%
Wind Direction – 300°	10 Hour Fuel Moisture – 9%	Woody Fuel Moisture – 60%
Crown Fire Method – S&B		

Flame lengths across the project area exhibit are generally 1-4 feet primarily. Rates of spread are divided with 42% of the landscape averaging 2-5 Chains per hour (ch/hr) and 55% of the landscape experiencing 5-20 ch/hr. Fireline intensities are moderate and range between 100-500 BTU/ft-sec. Heat per unit area across the landscape is rather low and averages 0-300 Btu/ft². The landscape would exhibit surface fire largely while passive crown fire amounts to 3% of the total area. Active crown fire across the area is 0%.

Alternative A

Alternative-A would not alter the fuels load, composition, arrangement and/or continuity and the likelihood of low/moderate fire behavior would pose little challenge to contain with hand crews and heavy equipment.

Alternative B

Alternative-B would alter the fuel load, composition, arrangement and/or continuity eliminating wildland fire occurrence within the project area. Flora and fauna that are dependent on wildland fire to occur would be decreased significantly to the point of complete removal.

Economics

The energy market for Warm Spring remains a viable, near-term avenue to materially advance the Tribal economy and workforce needs for current and future generations. In particular, nationally and regionally, our energy systems are facing a unique combination of challenges. These include resource adequacy, historic load growth, resilience, natural resource concerns, and an attempt to meet state energy policy goals. This confluence of issues provides a unique opportunity for the Warm Springs Tribe to participate in meeting these challenges with its own project mix that

balances Tribal needs. Importantly, the energy generation market opportunity is time-limited as regional tribes, utilities, regulators, and private developers will continue to collaborate on projects and systems to address these needs in the next 10-20 years.

The Warm Springs Reservation contains resources and market access to additional renewable energy generation and energy storage. These projects can develop long-term revenue sources for the Tribes that are diversified and are therefore more reliable and resilient to market variability. These include lease revenues, tax revenues, workforce development assessments, along with power sale revenues.

Need: Tribal energy sovereignty needs to promote the Tribal economy by supporting the energy future of the individual, the community, and utility.

The energy supply on the Reservation has reliability and affordability issues and impacts natural and cultural resources. The Tribes can build on their energy experience and leadership to exert more self-determination over the sources and quality of energy service. Tribal energy sovereignty encompasses Tribal self-determination at the individual, community, and utility level. Energy sovereignty cannot be achieved without addressing all three of those things, and no one project can achieve full Tribal energy sovereignty.

The Reservation economy is currently supplied by one utility (PacifiCorp) and one electric cooperative (Wasco Electric), which operate within an interrelated regional energy market. These entities serve both individual and commercial customers through utility scale generation projects. Currently, electrical service for much of the Reservation has reliability and affordability issues, and the regional energy generation mix that serves the Reservation has natural and cultural resource impacts. More control over the sources and quality of electric service is needed on the Reservation at each of the utility, commercial, and individual scale. While commercial and individual energy needs can be supported by community and/or rooftop solar systems, utility-scale renewable generation is vital to ensure adequate and timely supply to support commercial and individual retail services. The mix of systems will help address reliability and affordability and support acceleration of more distributed generation while also helping to reduce carbon-based energy generation. This will allow for the development of on-Reservation infrastructure that is resilient, cost-effective, and supportive of future tribal utility service considerations.

Need: The Tribe's natural resource management goals are to balance environmental, cultural, and economic needs for future generations and for the protection of: water, fish, wildlife, roots, and berries. Since time immemorial, these are what guides our way of life, spiritually, give connection to the lands, and guide management of tribal lands.

Climate change is an existential threat to the Tribal community and way of life. Climate change increasingly impacts tribal homes, food, and overall lifestyle of Warm Springs Tribal members. Climate change threatens traditional ways of life. Current and future

impacts from climate change threaten native communities' access to traditional food such as fish, game, and wild and cultivated crops which, in turn, have an impact on cultural, economic, and community health life. Additionally, climate change challenges the integrity and stability of ecosystems on which native people live by changing ecosystem processes and biodiversity. Decreases in water quality and quantity affect drinking water supplies, food cultures, ceremonies, and traditional ways of life. Climate change affects native populations in various and impactful ways which threaten traditional ways of life.

As large, land-based Tribes with over 700,000 acres of on-Reservation and off-Reservation lands under Tribal natural and cultural resource management, the Tribes must meet these climate change challenges on a large scale and participate in promoting strategies to address the underlying causes of climate change.

The energy sector is a major contributor of greenhouse gas emissions. Oregon's landmark clean energy legislation (HB 2021) and Washington's Clean Energy Transformation Act are transforming how regional utilities must supply electric service to customers. By requiring the supply of electricity to be free of greenhouse gas emissions, regional utilities must acquire new renewable generation sources to meet targets. In addition to this, the region is experiencing significant load growth; for example, through the continued siting of data centers in the region that are needed to support existing and emerging technologies such as social media applications and AI.

Due to these and other significant factors, the region is undergoing a major energy transition. The previous major energy transition which occurred in the last century resulted in the development of the Columbia River Hydro system. The failure to integrate Tribal participation and traditional ecological knowledge or predict the scale of mitigation required to address the impacts to tribal fisheries and other resources predictably resulted in a system that operates at the expense of Tribal resources.

The disproportionate impacts to Tribes resulted in transferring wealth away from the Columbia River Tribes, such as Warm Springs, all of whom are Salmon people and whose lifeblood was and remains salmon fisheries.

See <https://www.doi.gov/media/document/tribal-circumstances-analysis> The Warm Springs Tribe is a signatory to the 2023 Resilient Columbia Basin Restoration Agreement which recognizes that Tribal participation in renewable power generation is necessary to help retool our energy infrastructure so that it is socially just. This agreement will include incorporating indigenous knowledge into project planning, tribal participation in renewable energy generation and transmission, and will create a reliance toward projects that can support tribal fishery restoration and cultural resource management. Each of the Four Treaty Tribes (Warm Springs, Yakama, Umatilla and Nez Perce) have pledged to collaborate on a tribal energy sovereignty program that will seek; (individually or collectively), to contribute at least 3,000 MW of tribally sponsored energy to the region to assist in the overall efforts to restore salmon and steelhead to "healthy and abundant levels."

In addition, direct Tribal engagement is necessary to ensure that new renewable energy project development, such as solar, are planned to manage the cultural landscapes in which they are sited. In summary, a management strategy to participate in renewable energy development is necessary to address climate change impacts, accelerate fishery restoration and other natural resource management goals, and ensure that cultural resources, such as designated traditional gathering sites, are sustained for current and future use.

Purpose: The purpose of this project is to support long-term and sustainable employment and revenue to the Tribe, its members, and future generations by exercising Tribal sovereignty to diversify the tribal economy with reliable revenue sources while promoting the energy future of individuals, community and utilities that balance environmental, cultural, and economic needs.

Employment Opportunities, Community Benefits and Economic Impacts

Alternative A – No Action

The No Action alternative results in no project which preserves unused land for the Tribe but also does not further any of the Tribes' needs for economic development, sustainable tribal trust and tax revenues, job creation and workforce training or community investment in energy infrastructure.

Alternative B – Proposed Action

The Project represents an opportunity for long-term investment in economic and social programs that address identified needs of the Tribe. The Project is designed to take advantage of BrightNight's experience, renewable development know-how and financial backing to create near term economic activity that can meaningfully support and expand funding of governmental functions and programs and open up workforce training and entrepreneurship opportunities in a time of reduced and uncertain federal spending.

The development proposal was established in full collaboration with Warm Springs Power & Water Enterprises (WSPWE) and is intended to advance CTWS tribal energy leadership and sustainable economic opportunity from the individual to enterprise level. Among others, the Project proposal includes formal commitments to supply new sources of tribal trust revenues, new tribal tax revenues, workforce development programming and funding, local participation, tribal preference hiring practices, community benefit investments and cultural and natural resource mitigation and enhancement activities and funding.

Workforce Development and Employment.

The Project is expected to generate significant short- and long-term employment opportunities in which Tribal members will have the first opportunity to participate. During construction, the Project could support up to 1,200 direct and indirect jobs over an estimated 18–24-month construction period (both on and off the Reservation). Examples include general labor, commercial truck operator, equipment operators, road flagging crews, solar panel installers, just to name a few. During

construction, employment levels may peak at up to 125 workers on site at a given time, and the Project's direct labor income during this construction period is estimated to be up to \$78 million. Combining direct and indirect impacts, the total economic activity during construction is projected to reach up to \$284 million.

Once operating, the facility could provide up to four full-time positions, including operations, maintenance, security, and site management roles. These positions are expected to offer competitive wages and benefits.

The Project proposal specifically requires that all labor and subcontracting activities comply with Tribal Employment Rights Office (TERO) standards, including use of Tribal contractors for site development, construction services, and long-term operations support. This also includes that qualified Tribal entities and workers receive preference in contracting, hiring, and procurement wherever feasible. BrightNight and WSPWE will work collaboratively with the TERO Office to prioritize hiring of Tribal members with the appropriate certifications, and to align workforce training programs with project timelines and TERO goals. The Project team, in collaboration with the TERO Office, would continue implementing targeted outreach to ensure Tribal member participation in all project phases, and BrightNight must maintain close coordination with TERO to ensure compliance, transparent reporting, and equitable access to all available opportunities.

The Project proposal includes a Community Development Fee structured to support TERO-related training and accreditation programs. This fee proposal is to provide funding up to \$3,000,000.

Tribal workforce participation and local engagement has also occurred during early project activities. BrightNight is utilizing Warm Springs Construction Enterprises to assist with equipment installation for project survey work, ensuring hands-on Tribal involvement during the Project's early phases. Tribal members have been hired as paid weekly meteorological station monitors to collect site-specific data critical to ongoing assessments and plant design. BrightNight has contracted with GeoVisions, a wholly owned enterprise of the Confederated Tribes of Warm Springs, to lead cultural resource surveys and monitoring work at Warm Springs as well as for multiple projects across the Pacific Northwest, completing nearly \$3 million in work to date. Through this relationship, BrightNight integrates Warm Springs Tribal cultural land management values and practices into its development approach to guide project planning and ensure the avoidance and protection of cultural resource materials on site.

Community Investments

The Project's proposed design will invest in leveraging existing infrastructure and existing Tribal contractual rights associated with the Pelton Project for the Tribe's benefit. With this design proposal, the Project can be implemented in the near-term, meeting Tribal needs sooner.

Over the Project's 25-year initial lease term, Salmonfly Solar is projected to generate sustained revenue streams for the Tribe through lease payments, local taxes, and ongoing operational spending. Key projected benefits include Up to \$1.5 million per year in new trust lease payments to CTWS and up to \$620,000 annually in new Tribal tax revenues. These new revenue sources can support senior

pensions, minor's trust accounts as well as secure reliable tribal revenues that are not dependent on federal funding variabilities. The Project proposal includes additional participation options for the Tribe at the Tribe's option. The Project investment and activities will also spur up to \$15 million annually in regional economic activity during operation; and up to \$900 million in total economic investment and activity over the Project's lifespan.

In the Project proposal, BrightNight has pledged other community support. This includes \$1,000,000 in scholarship support for Warm Springs students, up to \$400,000 for The Museum at Warm Springs throughout the Project's operational life, and other appropriate cultural and natural resource mitigation and restoration measures.

Mitigations

Water and Soil

Short and purposeful vehicle movements on the site, that minimize surface damage should help limit compaction.

Protect present vegetation as much as possible during and after construction, and plant or promote further native ground cover once panels are in place. Vegetative establishment has the potential to help relieve some of the compaction over time, increase water infiltration, as well as slow surface water down in the near term.

Establish a Reclamation Fund for the end of the project. Further research and consultation are needed before settling on a final number.

Recommendations of hydro studies for project implementation will be used.

Water withdrawal for the project will be determined.

Wildlife

Continued pre- and post-Project implementation surveys will be required to ensure that impacts to vegetation that is critical or sensitive is avoided or mitigated for. These plant species include sagebrush and bitterbrush, locally rare and culturally significant species, and other listed special status species for up to a minimum of five years post construction. This will include camera trapping, aerial surveys, and

other such methodologies that may assist in developing further any mitigations listed below.

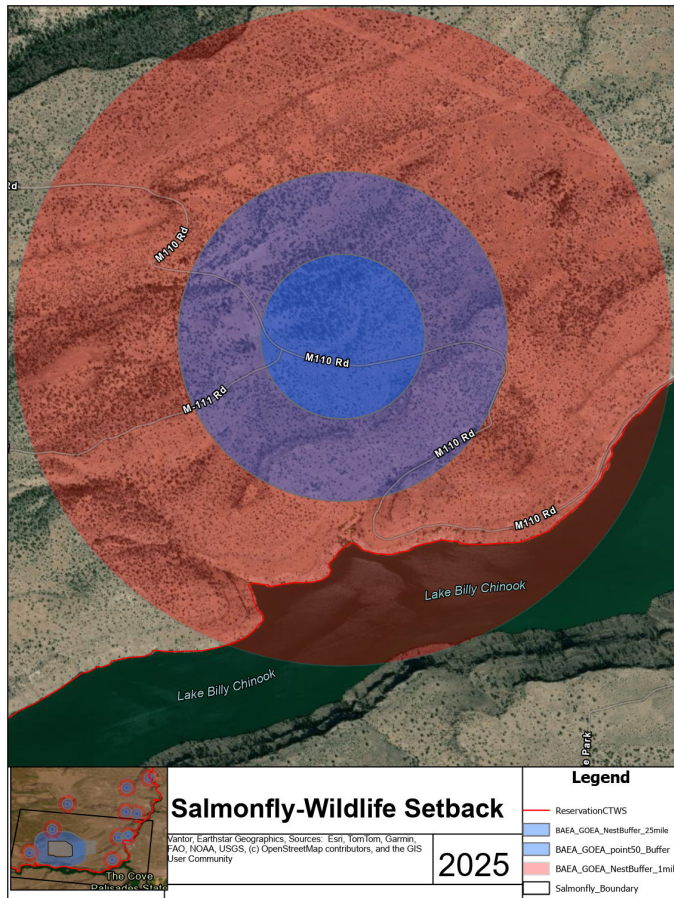


Figure 4 Wildlife - Raptor Nesting Restrictions Area

Transmission line construction will currently have seasonal restrictions from January 1st – August 31th based on current nest occupancy of Raptor nests identified within the gen-tie corridor. Nests will be surveyed for occupancy, and released for work once nest occupancy has ceased during seasonal restriction period.

USSE APE will have a winter seasonal closure of December 1st – April 30th to avoid impacts to mule deer and elk winter range.

Due to the level of disturbance to essential, limited, and irreplaceable habitat within the project footprint, at a minimum, no net loss of habitat quantity or quality should occur. In-kind, in or off proximity habitat enhancements will occur for up to 14,000 acres to assist with limiting this impact.

Fence removal for movement outside the facility commensurate in acreage to what is inhibited by the project footprint as a facet of restoration activity, done in

conjunction with other disciplines and grazing district.

Fences should be built to wildlife friendly specifications as provided by the BNR Wildlife Department. Some initial specs should include a minimum of eight feet tall to deter ungulate entrapment. Depending on fence type, bottom of fence or wire should be more than one foot off the ground to allow for movement of small wildlife species through the project area. Openings at routine spacings can significantly offset the impact of continuous fencing across the landscape in significant scales. These can be four feet by four feet or six feet by six feet routine openings. Fencing of solar arrays with corridors interspersed at 30 to 300 meters minimum can reduce the risk of entrapment of wildlife within facilities. Gates for egress on multiple sides of the Project area can help with allowing egress if corridors cannot be installed.

Placing fence markers at routine spacing can help with avoidance of collision for bird species, as well as help deter attempts to cross fence by ungulates. Avian Power Line Interaction Committee guidelines will be adhered to for mitigating electrocution and collision risk for birds.

Mowing can impact grassland nesting bird species and other wildlife that utilize patches and clumps of vegetation. Saving mowing for timing windows devoid of life history impacts can significantly reduce the effect on associated wildlife usage.

Any soil disturbance should be revegetated with commensurate native vegetation approved by BNR staff. Any topsoil that will need removal should be done in the earliest phase of construction to allow for re-use when doing reclamation activities. Soils should be recontoured to match the original topography as much as possible. Revegetation will seek to re-establish native grasses, forbs and shrubs to achieve cover and biodiversity needs of the landscape at the time of reclamation.

Range

Mitigations will be placed to avoid areas, minimize impacts, restore functions in an effort to offset loss. All mitigation implementations will be approved by BNR. A comprehensive mitigation plan will be assessed before approval.

- Long-term monitoring to evaluate effectiveness of mitigations
- 2:1 ratio of range restoration: manage invasive species, seed with native bunch grasses, forbs, and bitterbrush plugs, add to existing fence-line as restoration boundary: update/repair fences to be wildlife friendly specifications
- Seeding will be done with a native mix approved by BNR for all disturbed ground. Consult with BNR for time of seeding.
- Noxious weed spray at site as needed, along improved roads.
- Loss of AUM's compensation at federal market value of AUM's to improve range conditions.
- Vegetation control inside solar projects including weed management; follow CTWS Weed Management Plan
- Improve solar well and trough; pipe trough to outside of project footprint.
- Efforts will be made to make cut and split juniper available in easily accessible piles to tribal members for fire wood.
- Cut juniper that meets specifications will be used for by product materials.
- Exclude Range Inventory plot: A 100ft transect line starting at 44.616804, -121.364609 and ending at 44.616568, -121.364439 is marked with rebar. A buffer of 50ft will be around the transect line in all directions. Access will be needed from BNR staff to read the transect line every few years.

Cultural Resources

General Management Recommendations:

In consideration of the nature of the Project the following recommendations should be considered:

1. The proposed Salmonfly project that have not been previously surveyed for cultural resources (to modern standards) will need to be surveyed to THPO/CRD standards. Qualified Tribal Cultural Resource Technicians, Archaeologists or historians will need to conduct a compliance level Cultural Resource Inventory of the project;
2. Ethnographic Study with knowledgeable elders.
3. Botanical Cultural Plant Survey of the Project to identify Cultural plant environments in the project APE.
4. Data recovery of the remaining segments of Klamath trail. Overlay the Tribal Lidar data, Historic aerial imagery over the Salmonfly project APE. Ground truth and document any segment's identified using lidar and historical

imagery that is located within the Salmonfly APE. Trails maintain a spiritual connection between cultural landscapes.

5. If segments are identified using Lidar Data and ground truth identifies intact segments. Trail segments should be avoided with a buffer determined by an Archaeologist or THPO/CRD. If identified trail segments can't be avoided mitigate through Interpretive signage, creating public education material and collaborating with Cultural and Heritage committee.
6. Interpretive mitigation for the Klamath trail documenting the significance and purpose of the trail that is located within the reservation.
7. Sites within proposed Salmonfly project that have the potential to be affected by Project activities. Sites will be buffered around archaeological sites for avoidance in advance of construction activities. An Archaeologist or THPO will determine the width of the buffer. Management activities may occur within the buffer by implementing mitigation measures in the Cultural resource inventory report submitted to the THPO for Concurrence;
8. Additional consultation with the Culture & Heritage Committee and other knowledgeable individuals should be conducted, in order to identify areas within the Project that have the highest probability for containing important cultural resources;
9. All Project crews will be briefed/trained on avoidance and protection of potential sites that were identified during project activities, in order to avoid those sites.
10. Cultural Plant areas should be monitored annually to assess the impacts of specific project implementations, and to determine whether they were effective in reducing or eliminating adverse impacts. Monitoring will consist of pre- and post-field inspections.
11. Cultural Resource Tribal monitor present during ground disturbing activities within the project.
12. Off-site mitigation for cultural plant enhancement.
13. Project methods should be utilized that minimize negative impacts to cultural plants. This may include limiting the implementation phase to specific times of year avoiding impacting Root Gatherers when they are out gathering for feast or subsistence, limit project implementation when plants are flowering or fruiting, selective placement of access trails, roads, staging areas where there are gaps in cultural plant distribution, and avoidance of piling of vegetation debris within cultural plant areas.
14. Any Juniper felled within cultural plant gathering areas will not be piled and should be bucked to avoid impacts to Tribal members gathering cultural plants.
15. Cultural Plant gathering areas identified in project APE that could be managed for cultural plant enhancement within APE. The area identified can be utilized by Longhouse gatherers for Root gathering for feasts.
16. No Vegetation management within the Cultural gathering area set aside for Longhouse gatherers.
17. Mitigation for impacts to the Cultural plants within project that will be impacted by Weed and Vegetation management.

18. The cultural Resources staff will work with Branch of Natural Resources departments to develop prescriptions and management activities that promote the restoration and enhancement of cultural plants.
19. Inadvertent Discovery Plan in place before any Construction activities.

Economics and Employment

Based on the input from Tribal members in every public meeting on this project, we believe that Warm Springs Water and Power Enterprises (WSWPE) should develop an account for the equitable distribution of funds to Tribal members to offset the electric costs to Tribal members.

List of Preparers

BrightNight Project Leader.....	Andrew Fernandez, Director of Development
Water and Soil	Stuart Wilson, Soil Scientist
Fish.....	Ben Wiley, Fish Biologist
Wildlife.....	Max Oakes, Wildlife Biologist
Range.....	Sophia Escobar, Range Management Specialist
Cultural Resources.....	Larry Squiemphen III, THPO
Forest Vegetation.....	Manuel Frias, Area Forester
Transportation.....	Edward Heath, Transportation Engineer
Fire.....	Rodney Kenyon, Fuels Planner
Economic.....	BrightNight
Employment.....	BrightNight