

Appaloosa Solar Project Narrative

Appaloosa Solar Project LLC hereby requests a Solar Facility Permit for the Appaloosa Solar Project (the “Project”) in Garfield County, Washington. The following information responds to Garfield County requirements for a Solar Facility Permit Application, as outlined under the Garfield County Zoning Ordinance (GCZO), Chapter 1.05 (Conditional Uses), Sections 1.05.020 (Application for a conditional use) and 1.05.080 (Wind Power Generators, Solar, and Fuel Cell Energy).

1. Overview

The Project consists of 300 MW of alternating current (AC) solar photovoltaic arrays with a battery storage facility capable of storing up to 150 MW of energy. The solar panel array system will be interconnected with underground AC electrical lines to a Project substation and battery energy storage system (BESS). A new above ground transmission line approximately 2.5 miles long will interconnect to Puget Sound Energy’s (PSE) Phalen Gulch 230 kilovolt (kV) substation.

The Applicant proposes to build the Project on 1,790 acres of fourteen tax lot parcels. The fourteen parcels contain a total land area of 7,000 acres (“Project Area”). An image of the preliminary site plan is provided at Exhibit 1, below.

2. Project Description

2.1. Proposed Use

The Project will install a Grid-Tie Solar System, using bifacial solar panels in a dense array, as illustrated in Exhibit 2 below and SEPA Checklist, Figure 6. The solar panels capture sunlight directly from the sun and reflective off the ground. They will be manufactured by Qcells and mounted on single axis trackers where the panels will rotate throughout the day to track the sun and maximize efficiency and sunlight capture. The height of solar panels would vary as they move throughout the day; however, the maximum height of the panels in the vertical position would be approximately 15 feet tall including a 2-foot clearance above ground.

Electricity produced by the solar panels is direct current (DC) and is converted by inverters into AC. Each inverter is coupled with a medium voltage step-up transformer to increase the voltage of the power to a medium voltage of 34.5 kilovolts (kV) which minimizes losses for the collection of the power into the substation.

The solar panel array system will be interconnected with underground AC electrical lines to a new Project substation (approximately 5 acres) connecting to an above-ground 230-kV transmission line with protection circuits that will interconnect with Puget Sound Energy’s (PSE’s) Phalen Gulch 230 kV substation (see SEPA Checklist, SEPA Checklist Figure 3). A new aboveground transmission line will have a single pole configuration approximately 2.5 miles long with a direct interconnection with the PSE substation. Within the PSE substation, the power will be connected with an existing ring bus in an available bay and with breakers/communications equipment and remedial action scheme protection to an existing 230-kV transmission line to intertie with the existing 500-kV Bonneville Power Administration (BPA) Central Ferry Substation, which is within the Project boundaries (SEPA Checklist, SEPA Checklist Figure 4). There would be no changes to the existing footprint of the Phalen Gulch or Central Ferry Substations.

The BESS and new Project substation will be located on approximately 15 acres adjacent to State Highway 127 (SEPA Checklist Figures 3 and 4). The BESS (approximately 10 acres) will use lithium-ion technology for the batteries. Energy storage consists of modular, self-contained metal containers. Lithium-ion battery

technology is composed of individual cells that are hermetically sealed and cannot be opened on-site and do not have any wastewater discharges. Lithium-ion battery containers are equipped with an internal fire suppression system, including monitoring equipment and alarm systems with remote shut-off capabilities. The BESS facility would meet the standards of the Fire Code and National Fire Protection Association.

The Project would not include an on-site operation and maintenance building.

2.2. Roads

The Project would use existing roads for construction, operation, and maintenance access to the maximum extent possible. The Project will use existing parking and construction laydown areas previously used for construction of the LSR Wind Project to the extent possible. All laydown areas would be located within the Project area and would cover approximately 9 acres.

However, the Project will require up to approximately 27 miles of new roads for construction and maintenance access within the solar array areas (SEPA Checklist Figure 4). Two new access roads would be constructed off State Highway 127, approximately in the location where the collector substation is and on the opposite side of the road, as indicated in the photo below by a red circles.



One of the roads will provide access from the Highway to the the Project substation and BESS (indicated by the yellow line in the photo above) and another to access the solar array on the opposite side of the Highway from the Project substation.

2.3. Construction Process & Sequence

Construction is anticipated to begin with roads and grading first. After the roads are in, construction will begin by installing solar panels first, then building the substation, BESS, and power lines. The construction phases may not be discreet and will likely proceed in parallel, for at least part of the Project.

2.4. Proposed Schedule

Below is the anticipated schedule for construction.

- August 2021–December 2023: Environmental review and permitting
- January 2022–April 2024: Preconstruction engineering and surveying
- April 2024–July 2024: Construction permits and approvals
- August 2024–October 2025: Construction activities
- December 2025: Final testing and Commercial Operations Date

3. Regulatory Compliance

3.1. Garfield County Comprehensive Plan and Zoning Ordinance

3.1.1. Consistency with the Comprehensive Plan

This Project is proposed on land designated as Agricultural under the Garfield County and City of Pomeroy Comprehensive Plan, adopted June 2019 (GCCP) and is within an agricultural zone. *See Exhibit 3, below.* The GCCP explicitly finds that solar facilities are compatible with agricultural production, as discussed below.

The Project is consistent with goals, policies and objectives stated in the GCCP, including continued economic development and appropriate provision of utilities in a pattern which is compatible with adjacent land uses. As discussed below, solar facilities are compatible with existing agricultural production and land use policies and goals in the region.

In July 2019, the County updated the Comprehensive Plan, in part, to add solar as a recognized potential renewable energy source. “Passage of Washington’s renewable energy portfolio standards requires the generation of clean renewable energy which can be met by wind and solar energy facilities.” GCCP p 133.

Accordingly, the GCCP allows solar parks/farms as a Conditional Use within the Agricultural Zone. GCCP p 133. The GCCP does not allow solar energy facility development in any other zone. *Id.*

The Project proposes a battery storage facility, electrical transmission lines, substation, and overhead power lines, all of which are considered permissible accessory uses and have been included in this application, as required. GCCP p 133.

The Project supports Land Use Element Resource Protection, Policy 7 – “Maintain and enhance natural resource-based industries, including productive timber, agriculture, and fisheries industries” – because it uses a natural resource (sunlight) to generate energy, while at the same time allowing the majority (>74%) of the 7,000 acre Project area to remain in agricultural production. GCCP p. 15.

The Natural Resources Conservation Service (NRCS) soils data maps approximately 1,333 acres of the 1,790-acre Project area as “farmland of statewide importance,” 83 acres as “prime farmland,” and the remaining 374 acres are not prime farmland. Based on review of the Conservation Biology Institute’s Farmland Value Map for the Columbia Plateau region of eastern Washington,¹ farmland ratings within the Project area range from approximately -0.5 to 0.5, on a scale of -1 to 1, with 1 being highest value farmland.

Approximately 1,093 acres of that are actively cultivated croplands (see SEPA Checklist Section B.4 and Figure 5 (brown areas in areas C-H), which will be removed from crop production for the life of the project

¹ Available at: <https://wsuenergy.databasin.org/maps/6b45a1560c3640e388f18626b7e8810d/active/>

(approximately 40 years)). The landowners estimate the loss will be imperceptible in the local agricultural market. The landowners' income from the Project is expected to be higher than through crop production, thus subsidizing their remaining crop farming efforts.

The Project will remove approximately 680 acres from animal grazing, as illustrated in green and yellow (herbaceous growth and shrub steppe, areas A-C) on the SEPA Checklist, Figure 5. This loss will not affect the animals, their growth, or the landowners' ability to continue farming in anyway. Instead, the animals will continue grazing in the non-solar areas of the Project area – allowing landowners to increase profits and productivity from currently under-utilized agricultural lands. The landowners indicate that densifying the animal grazing is feasible on the remaining lands.

Following decommissioning and reclamation of the Project area, agricultural uses would be able to resume. According to the USDA, in 2017 there were 289,848 acres in agriculture production in Garfield County. Using this amount, the Project would temporarily convert approximately 0.5% of the overall amount of agricultural land in the county. This amount of temporary conversion is not expected to adversely impact agricultural land or overall character in the county during construction or operation of the Project.

Compliance with the Critical Areas Ordinance provisions for agricultural lands (as discussed below) further implements the goal of natural resource protection.

The Project will provide an “environmentally sensitive, safe and reliable, aesthetically compatible” energy source, as desired by GCCP Goal I:B - “To facilitate the provision of utilities that are environmentally sensitive, safe and reliable, aesthetically compatible with the surrounding land uses, and available at reasonable economic costs.” GCCP p. 134.

Because the Project will be located inside the LSR Wind Project area and very near existing Main Electrical Lines and Utility Transportation Corridors, it supports Objective A: Policies 1 and 3, encouraging “new public and private utility distribution facilities” to be co-located “in shared trenches...to...reduce the cost of utility delivery” and “provision of an efficient, cost effective and reliable utility service by ensuring land will be made available for the location of utility lines, including location with transportation corridors.” GCCP p. 135; Exhibits 4 - 5.

Because the Project will build a renewable energy source, it supports Objective B: Energy Conservation and Conversion, Policy 2: “The...County will facilitate the conversion to cost-effective and environmentally sensitive alternative technologies such as renewable energy sources.” GCCP pp. 135-136.

The 2019 update to the GCCP acknowledged the number of farms and the number of farmers in the County have declined steadily as farms are consolidated and mechanization has reduced manual labor requirements. GCCP p. 4. The County wanted to ensure the GCCP still reflected the needs and desires of its citizens.

After engaging in public participation hearings and feedback, County concluded that solar Projects can be part of an economic solution for farmers:

solar energy facilities potentially can add farm revenue to offset unstable or falling prices for wheat, alfalfa and beef cattle and higher production costs and property taxes. Our economic development strategy is to strengthen and promote our agricultural economy and broaden the tax base. The County and its junior and special taxing districts (such as fire,

school and special utility districts) will see valuations increase and a variety of tax benefits to its taxpayers.

GCCP p 133.

The applicant whole-heartedly agrees. During construction, peak employment for the Project would be approximately 350 workers, including survey crews, land-clearing crews, construction and electrical workers, inspectors, and delivery truck drivers. Thus, construction of the Project will encourage economic and employment growth, just as its predecessor LSR Wind Project did. GCCP p.24 (County employment declined 1.2 percent per year since 2006, but “[t]here were some changes with the Lower Snake Wind Project, which increased the overall number of jobs in the community”) and 26 (listing employment impact numbers). Accordingly, this Project supports the GCCP’s Economic Development Element Goal B – “To encourage economic development throughout the city and county that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this county, especially for unemployed and for disadvantaged persons, and encourage growth, all within the capacities of the county’s natural resources, public services, and public facilities.” GCCP p. 142.

It also supports GCCP’s Rural Element Objective C states: “The economic value and worth of Rural Areas should be recognized and appropriate steps taken to ensure and enhance their long-term survival.” GCCP p. 153. The Project allows for continued agricultural production on 74.5% of the lands within the Project area; increases the productivity and income of the lands removed from agricultural production; and subsidizes ongoing operations on the remaining agricultural land. The presence of solar arrays on agricultural land will generate sources of additional income to landowners, which helps buffer them from harsh economic cycles within the agricultural industry. The additional income generated from a solar facility mitigates against the need to subdivide the property and sell it to supplement income, thereby leaving large swaths of Rural lands intact and protected from sprawl.

3.1.2. Consistency with the Garfield County Zoning Ordinance (GCZO)

All land in Garfield County is designated “agricultural” except for certain specified areas. *See* Exhibit 3, below. As discussed above, the GCCP prohibits solar facilities in all designations other than agricultural. The Applicant proposes to build the Project on land designated and zoned as agricultural.

GCZO 1.03.010(1) describes the purpose and intent for the agricultural zone as:

intended to protect and preserve the character of existing aglands with a minimal amount of development; only allowing land uses which are compatible with the established pattern including the development of low-density residential and commercial uses which support agriculture. It is not intended to allow other land uses of a commercial or industrial nature which have the potential to erode the agricultural character of the zone. **Garfield County may allow “renewable energy facilities” as a conditional use in the agricultural zone.**

(Emphasis added). Because the Project is a renewable energy facility, it is consistent with the purpose and intent for agriculturally zoned land.

The County’s application requirements and conditions of approval for a solar facility permit, as stated under GCZO Sections 1.05.020 and .080, are listed below in italic font, along with the applicant’s response provided in below font.

1.05.020 Application for a conditional use. *An applicant may initiate a request for a conditional use or for the modification of an existing conditional use by filing an application with the zoning official on forms provided by the County. The application shall be submitted at least fifteen (15) days prior to the meeting at which it will be considered. The application shall be accompanied by a site plan, drawn to scale, showing the dimensions and arrangement of the proposed development. The zoning official may request other drawings or information necessary to an understanding of the request. The County shall issue a Determination of Completeness regarding the application within twenty-eight (28) days of the date of receipt of the application. (Underlining emphasis added)*

The Applicant submitted a completed Garfield County Conditional Use Permit Application with this Narrative. The Applicant submitted a preliminary site plan, dawn to scale, showing the dimensions and arrangement of the proposed Solar Project with this Application and attached an image of that site plan at Exhibit 1 below, for convenience.

1.05.080(5) Permit Application. *Application for a permit to create a Solar Facility, Solar or Fuel Cell Energy Facility, shall be filed at the office of the Zoning Official for a conditional use. The fee for such application shall be set by separate Resolution. The application for a permit shall be in writing, signed by the applicant, and shall include the following:*

a. *The name and address of the applicant;*

Applicant Name: Appaloosa Solar Project LLC (ASP)
 Applicant Contact Information:
 HQC Solar Holdings 1 LLC (parent of ASP), Attn: Brian Tran
 300 Spectrum Center Drive, Suite 1250
 Irvine, CA 92618
brian.tran@qcells.com
 (626) 646-3560

b. *The location and complete legal description of the proposed facility;*

The Project site is located in unincorporated Garfield County, approximately 13 miles northwest of Pomeroy, Washington on leased land owned by the Morgan Family Trust, the H. C. Barr Family Trust (and PSL Farms LLC, a Barr company); and Klaveano Ranch, Inc. The overall Project area consists of 14 tax lot parcels totaling approximately 7,000 acres (see Table 1, below). The complete legal descriptions for the properties are attached at Exhibit 7. The actual Project construction area where development would occur (i.e., fenced solar arrays, substation, and battery energy storage system [BESS] areas) covers approximately 1,790 acres of the property, as illustrated in Figure 2 of the SEPA Checklist.

Table 1. Project Area Parcels and Legal Description

Property Owner	Parcel No.	Section	Township	Range
Morgan Family Trust	2-012-40-001-2000-0000	1	12N	40E
Morgan Family Trust	2-012-40-002-1000-0000	2	12N	40E
Morgan Family Trust	2-013-40-027-1000-0000	27	13N	40E
Morgan Family Trust	2-013-40-035-2000-0000	35	13N	40E
PSL Farms LLC	2-012-40-003-1000-0000	3	12N	40E
H.C. Barr Family Trust	2-013-40-032-1000-1000	32	13N	40E
H.C. Barr Family Trust	2-013-40-033-1000-1000	33	13N	40E

H.C. Barr Family Trust	2-013-40-034-1000-0000	34	13N	40E
H.C. Barr Family Trust	2-013-40-028-4000-0000	28	13N	40E
Klaveano Ranch, Inc.	2-013-40-017-1000-0000	17	13N	40E
Klaveano Ranch, Inc.	2-013-40-020-1010-0000	20	13N	40E
Klaveano Ranch, Inc.	2-013-40-021-1010-0000	21	13N	40E
Klaveano Ranch, Inc.	2-013-40-028-1000-0000	28	13N	40E
Klaveano Ranch, Inc.	2-013-40-029-1000-0000	29	13N	40E

c. *One hard copy and one digital file of the complete layout plan for persons reviewing the application.*

The Applicant submitted a preliminary site plan, drawn to scale, showing the dimensions and arrangement of the proposed Solar Project with this Application. An image of that site plan is attached as Exhibit 1 below, for convenience.

d. *If it is possible at this point in the application process for the applicant to provide the micrositing plans and/or the cultural resources survey, these items should be included in the application.*

The preliminary site plan (see, e.g., Exhibit 1) shows the boundaries of the area in which Project infrastructure will be sited. Within the 1,790-acre Project area, the final footprint of Project infrastructure will occupy a smaller area to accommodate required setbacks and other developmental constraints.

Micrositing plans and the cultural resources survey are addressed at SEPA Checklist, Appendix A, item I-11 and pages 41-49.

1.05.080(8) Conditions of Approval. *The following conditions shall govern any and all Project Phases during construction and operation, as applicable, and shall be upon all successors and assigns of the Applicant. This is not an all-inclusive listing – other conditions may be attached for approval, as required.*

See the SEPA Checklist, Appendix A, pages 39-41 for a discussion of the Project Plans related to this Application.

I. Permits

The Project will obtain all required permits for all Project components. In addition to obtaining a conditional use permit, the applicant will obtain county road use and right-of-way permits prior to road construction. The applicant will obtain building permits prior to preparing any Project-related foundations. See the SEPA Checklist, Appendix A, pages 41-42 for a discussion of the Permits related to this Application.

II. Comprehensive Project Conditions

See the SEPA Checklist, Appendix A, pages 42-45.

III. Project Design and Micrositing

See the SEPA Checklist, Appendix A, pages 45-49.

3.2. Garfield County Critical Areas Ordinance (GCAO)

As described in the Applicant's SEPA Checklist, Appendix A, pages 47-48 (sections IV-12 to IV-23), the Project has identified some critical areas in the Project Area. In summary:

- Geologic Hazard Areas: There are no geohazards on the site. The steepest slope is 14%, as shown on [garfield_nehrp_ofr04-20.ai \(wa.gov\)](#) and [garfield_liq_ofr04-20.ai \(wa.gov\)](#).
- Wetlands: There are no wetlands in the Project Area. Preliminary surveys done in 2021 identified a few ephemeral streams, as show in SEPA Checklist Figure 2 of the Natural Resource Assessment (included as Appendix B of the SEPA checklist). Formal wetland and water delineation were completed by SWCA in spring 2023 and the delineation report is underway; this report will include additional SEPA Checklist Figures showing the locations of all delineated features (which is limited to just a few ephemeral streams).
- Critical aquifer recharge areas: The Project does not have an onsite well. There is at least one well located on the Klaveano property, from which the Applicant would like to draw at least some of the water for the Project. The Project will avoid critical aquifer recharge areas and wellheads, and will comply with best management practices to protect groundwater.
- Fish and wildlife habitat conservation areas: The Washington Department of Fish and Wildlife (WDFW) has identified mule deer migration routes through the Project Area ([PHS on the Web \(wa.gov\)](#)). SEPA Checklist Figures 4, 5 and 6 of the Natural Resource Assessment (included as Appendix B of the SEPA checklist) relate to mule deer use studies done in 2021. The Applicant is working with WDFW to refine everyone's understanding of mule deer migration routes. In addition, the power lines will be designed and operated to meet avian protection as provided for by the Avian Power Line Interaction Committee (APLIC) standards.
 - In order to minimize impacts to wildlife, only the small groups of solar panel arrays (depicted as areas "A" through "H" on SEPA Checklist Figure 3) would be fenced individually; this includes the BESS and Project substation in area D. In total, approximately 22 miles of fencing would be installed for the proposed Project (of which approximately 1 mile would surround the BESS/Project substation and the remainder would enclose solar arrays). The chain-link fencing would be up to 8 feet in height and raised a minimum of 4 inches above grade.
 - A list of Applicant-proposed avoidance, minimization, and mitigation measures which are included as part of the proposed Project are provided in Appendix A.
- Frequently flooded areas: there are no frequently flooded areas in the Project area; and
- Cultural resources: the construction are of the Project does not interfere with the cultural resources in the Project area that were identified during the LSR Wind Project and during previous cultural resource studies. In addition, the Applicant is working with DAHP and the Nez Perce Tribe, Confederated Tribes and Bands of the Yakama Nation, and Confederated Tribes of the Colville Reservation to identify any additional cultural resources that may be in the area. The additional study/research areas are indicated by the black area markers on Exhibit 6. See SEPA Checklist, Appendix A, item I-11 for additional information.

3.3. SEPA

The State Environmental Policy Act (SEPA), RCW Chapter 43.21 requires governmental agencies to consider the environmental impacts of a proposal before making decisions. The Applicant submitted a SEPA checklist with this Application.

3.4. Findings of Fact Warranting Approval

GCZO section 1.05.050 lists five criteria for approval, or “findings of fact,” required for approval of a solar facility CUP: the proposed use

- (1) is either compatible with other uses in the surrounding area or is no more incompatible than are other outright permitted uses in the applicable zone;*
- (2) will not materially endanger the health, safety, and welfare of the surrounding community to an extent greater than that associated with other permitted uses in the applicable zone;*
- (3) would not cause the pedestrian and vehicular traffic associated with the use to conflict with existing and anticipated traffic in the neighborhood to an extent greater than that associated with other permitted uses in the applicable zone;*
- (4) will be supported by adequate service facilities and would not adversely affect public services to the surrounding area; and*
- (5) is not in conflict with the goals and policies expressed in the current version of the County's comprehensive plan.*

The Project satisfies all five criteria.

Criterion #1: The Project is compatible with other uses in the surrounding area because the Project is immediately adjacent to the LSR Wind Project for renewable energy production. At a minimum, the Project is not *more* incompatible than are other outright permitted uses in the applicable zone. Although the Applicant is not required to meet both options under this Criterion, the discussion below reveals that, in fact, it does.

In addition to the neighboring LSR Wind Project to the south and southwest, land to the west, north, and east is used for agriculture, animal grazing, and low density residential.

At a minimum, though, the Project is not *more* incompatible than other outright permitted uses in the agricultural zone. Table 2, below, lists the uses are outright permitted in the Agricultural zone. Because solar arrays function almost without direct human contact, virtually every permitted use listed in Table 2 will generate more traffic than the Project. Thus, from a traffic/transportation perspective, the Project is not *more* incompatible than the permitted uses.

Gravel pits, rock quarries, sawmills, county fairgrounds, and fire/emergency stations (which are outright permitted uses) would produce much more noise and traffic than solar arrays. Animal farms, county fairgrounds, dairy products processing, riding arenas and wood processing plants would likely generate noise and a variety of noxious odors, neither of which are a concern from the nearly soundless and completely odorless solar arrays planned for the Project. These characteristics suggest the Project is not *more* incompatible with low-density residential uses, than any of these listed, outright permitted uses.

Table 2: Permitted Uses in the Agricultural Zone

Single-family dwelling	Two-family Dwelling	Accessory Agriculture Structures	Automobile storage-Enclosed-hidden	Bed and Breakfast Inn
Camps & Camping Units	Caretaker's Residence	Cemetery	Child Day Care provider	County Fairgrounds
Dairy Products Processing	Duplex Dwelling	Accessory Dwelling Unit (attached)	Espresso stand	Family day-care provider
Farming without livestock	Fire/emergency vehicle station	Fruit or vegetable stands	Garage, private	Grain storage, private
Handicap House	Home occupation	Manufactured House	Mobile Home	Mobile Food Delivery Stand
Nursery for flowers and plants	Private summer/winter cottages or cabins used for recreational purposes	Public Utility buildings/yards	Raising 2 or fewer cows or horses or a combination thereof per acre	Raising 25 or more fowl or ten or more swine per acre
Raising of twenty-five or less fowl or ten or less swine provided that no permit shall be issued for the raising of swine or fowl within a distance of 500 feet from any dwelling other than the owner's dwelling				
Raising of twenty-five or less fowl or ten or less swine provided that no permit shall be issued for the raising of swine or fowl within a distance of 500 feet from any dwelling other than the owner's dwelling				
Sand and gravel pits and rock quarries so long as the location of the outer boundary of said pit or quarry is not within 1,000 feet from any dwelling other than the operator's dwelling				
Riding Arena - private	Sawmill - Wood Products Plant	Single-family dwelling	Solar energy collector – personal	
Tiny Home/house	Two-family dwelling	Wood processing plant		

Criterion #2: The Project will not materially endanger the health, safety, and welfare of the surrounding community in any manner than other permitted uses in the agricultural zone. Potential health and safety risks from Project construction and operation include the risk of fire or explosion; the potential for release of hazardous materials; vandalism; traffic accidents; and reflections/glare from the solar arrays. Each of these issues are addressed in detail in the Applicant's SEPA Checklist in response to questions B.7 (environmental health), B.12 (light and glare), and B.16 (public services) and Appendix A (site security plan, traffic and transportation).

Criterion #3: The pedestrian and vehicular traffic associated with the Project will not conflict with existing or anticipated traffic in the area any more so than other permitted uses in the agricultural zone. In fact, agricultural uses typically generate much more traffic than solar arrays because farmers must travel to the property regularly to manage and care for animals and their crops. Crop farming often requires very large vehicles for planting, spraying, and harvesting. Solar arrays, in contrast, are largely self-sustaining.

Criterion #4: The Project will be supported by adequate service facilities and would not adversely affect public services to the surrounding area. The Project will generate its own power and will obtain water from

existing private water sources. No impacts to water, stormwater, sewer, or solid waste facilities are anticipated as a result of the Project. It is not anticipated that there will be impacts to fire protection or law enforcement. Although the potential for fires as a result of construction is low, fire suppression equipment would be stored on-site, including a water pump truck, dozers, and manual equipment. All construction vehicles on-site will be equipped with fire extinguishers and shovels. The Project will be fully fenced and the Applicant will have a site security plan, thus minimizing the opportunity for vandalism and negative impacts on law enforcement.

Criterion #5: As explained on pages 3-5 above, the Project does not conflict with the goals and policies expressed in the current version of the County's comprehensive plan. In fact, it directly and expressly supports many of them.

Exhibit 1 Preliminary Site Plan

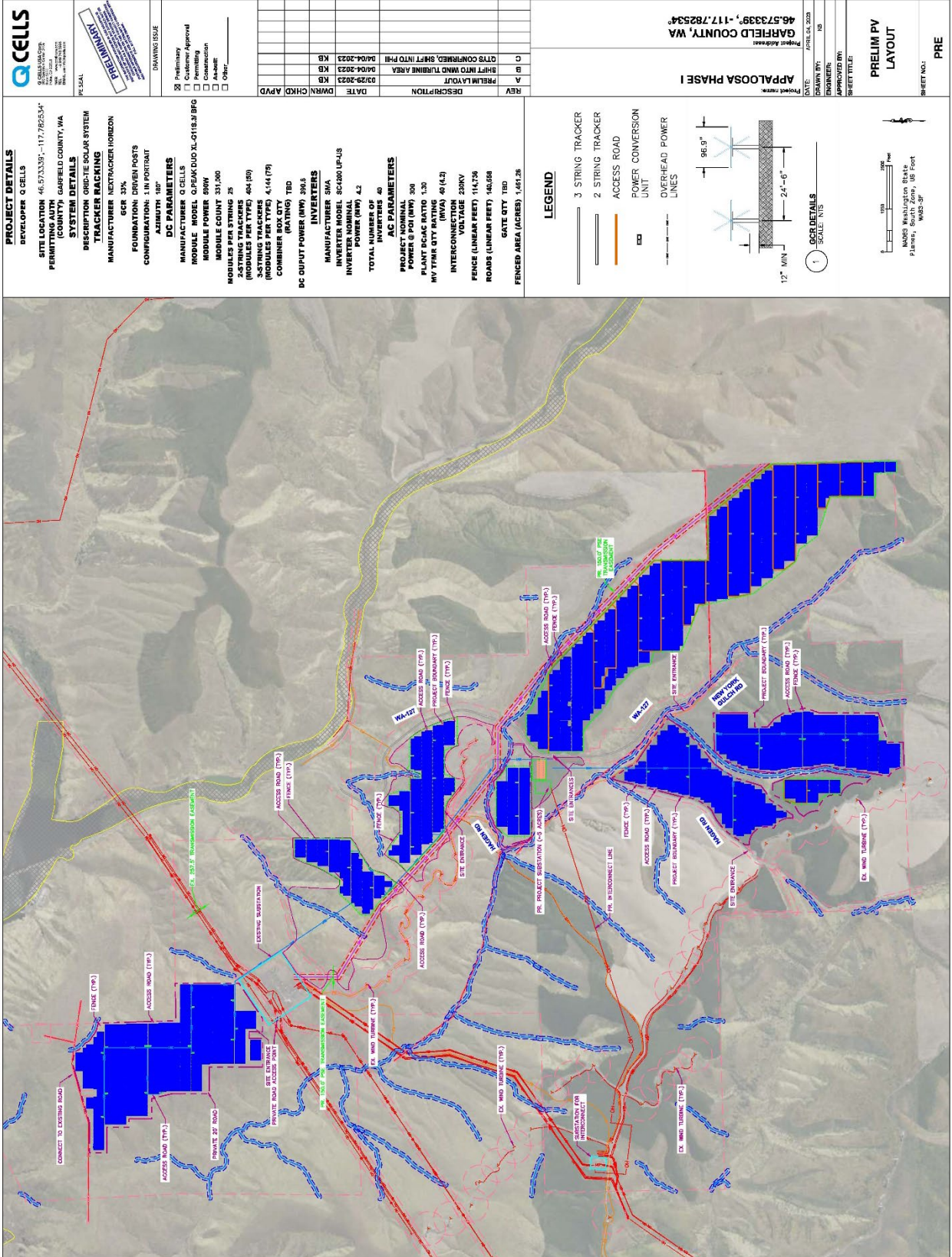


Exhibit 3
Garfield County Zoning Map
 Areas not otherwise designated, are zoned “agricultural”

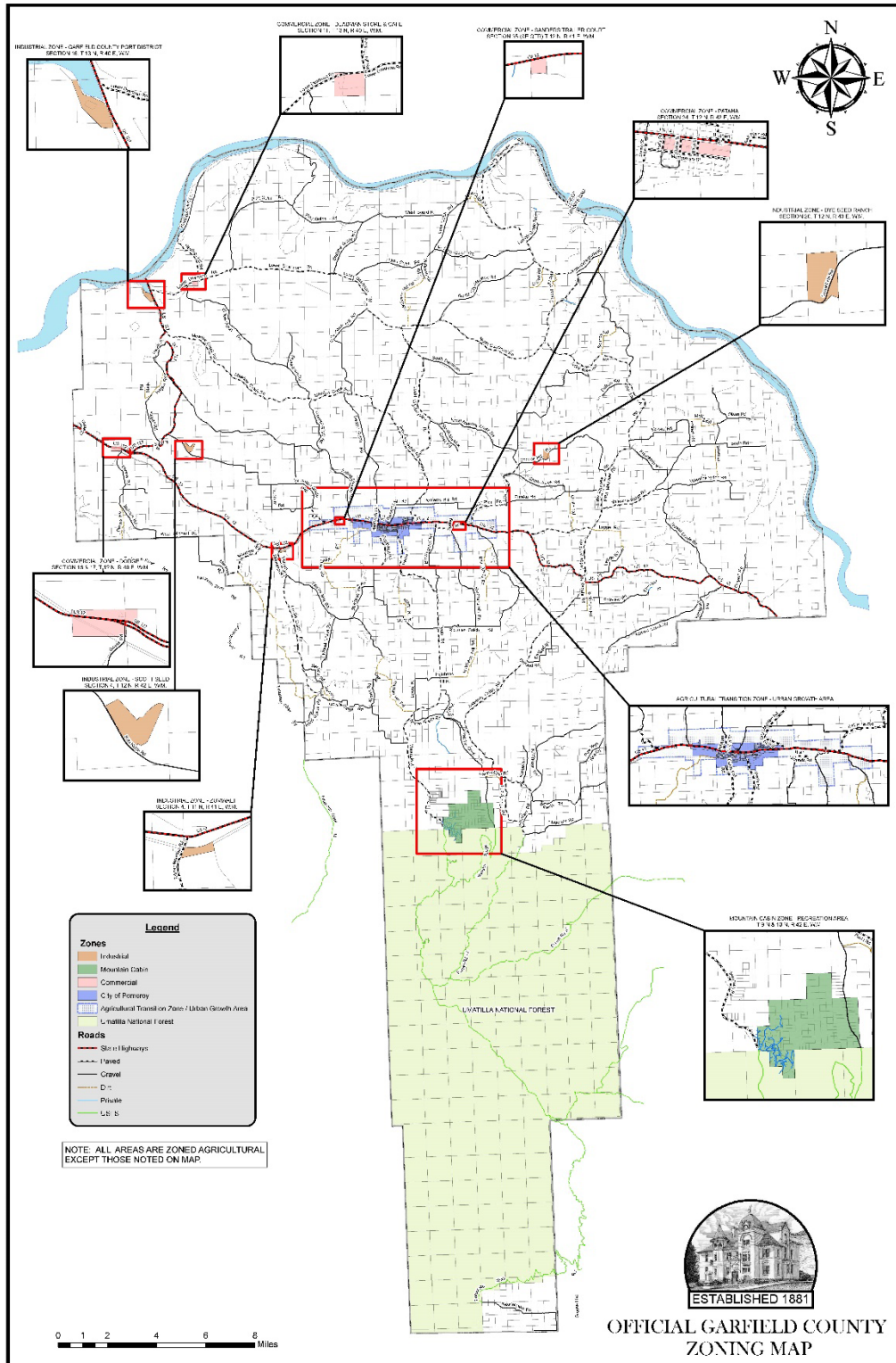


Exhibit 3
Close-up Project Illustration
(Solar panels in blue)

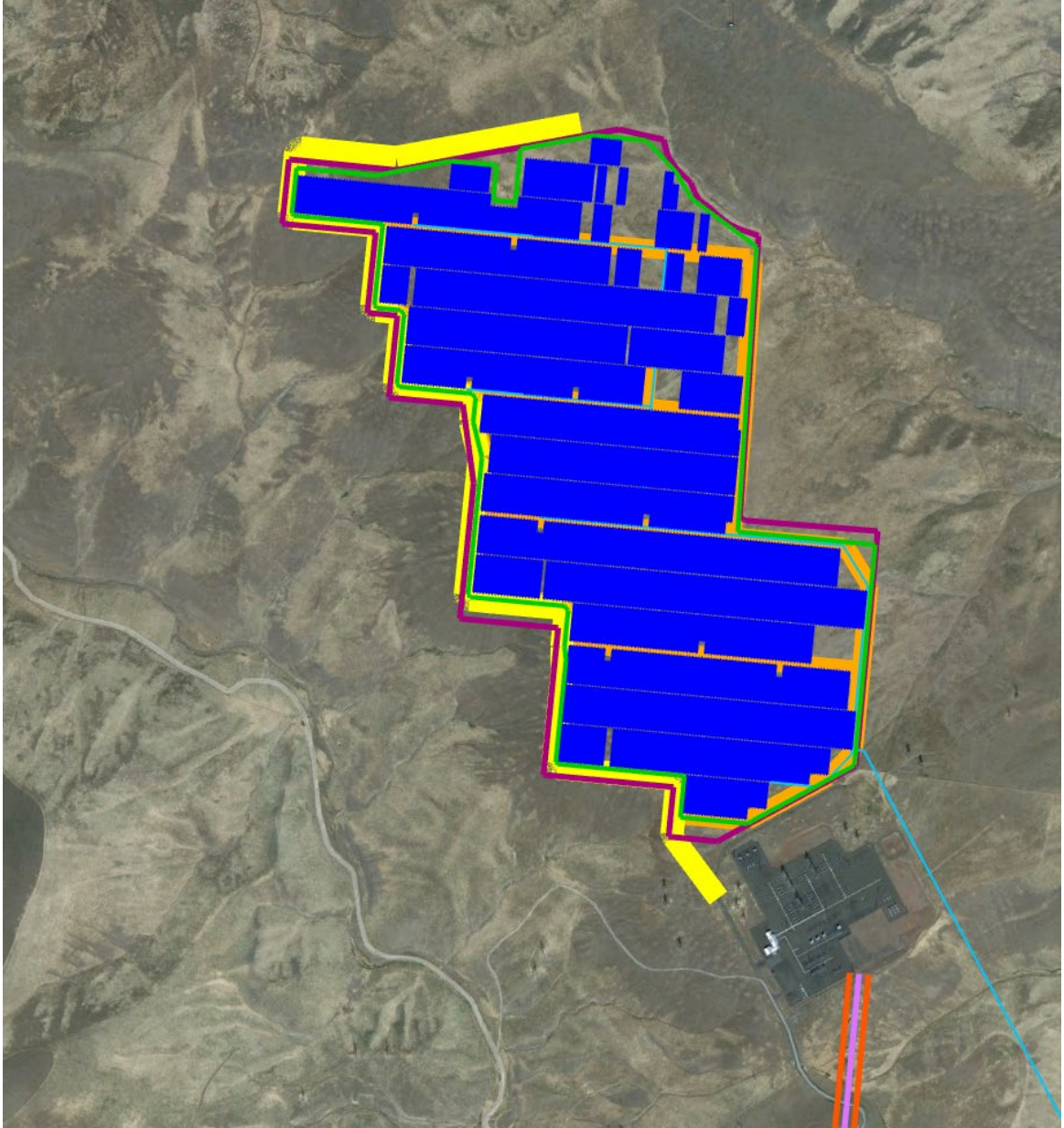


Exhibit 4
Main Electrical Lines, GCCP p. 125

Appaloosa Solar Project

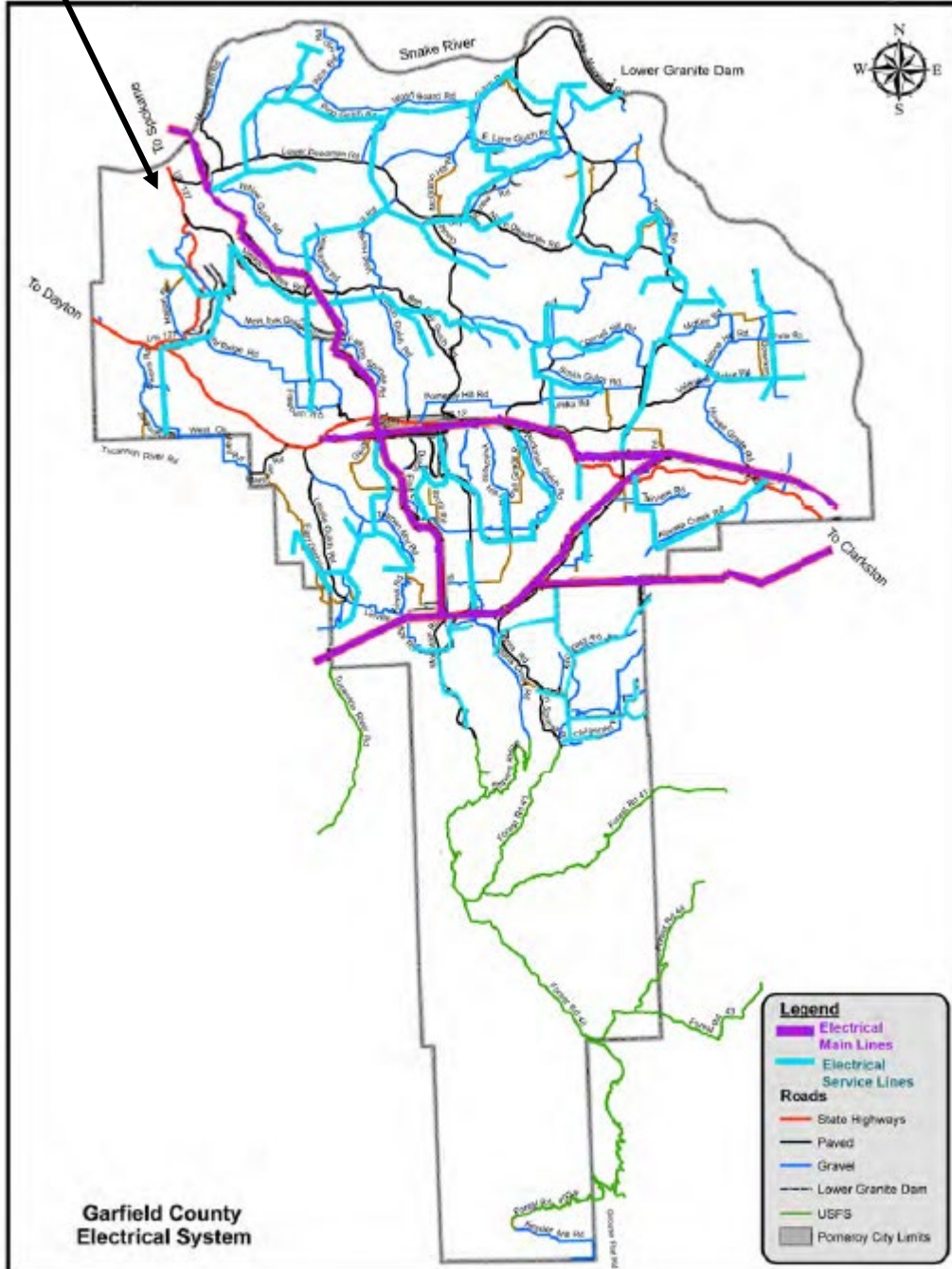


Exhibit 5
Utility Transportation Corridors, GCCP p. 132

Appaloosa Solar Project

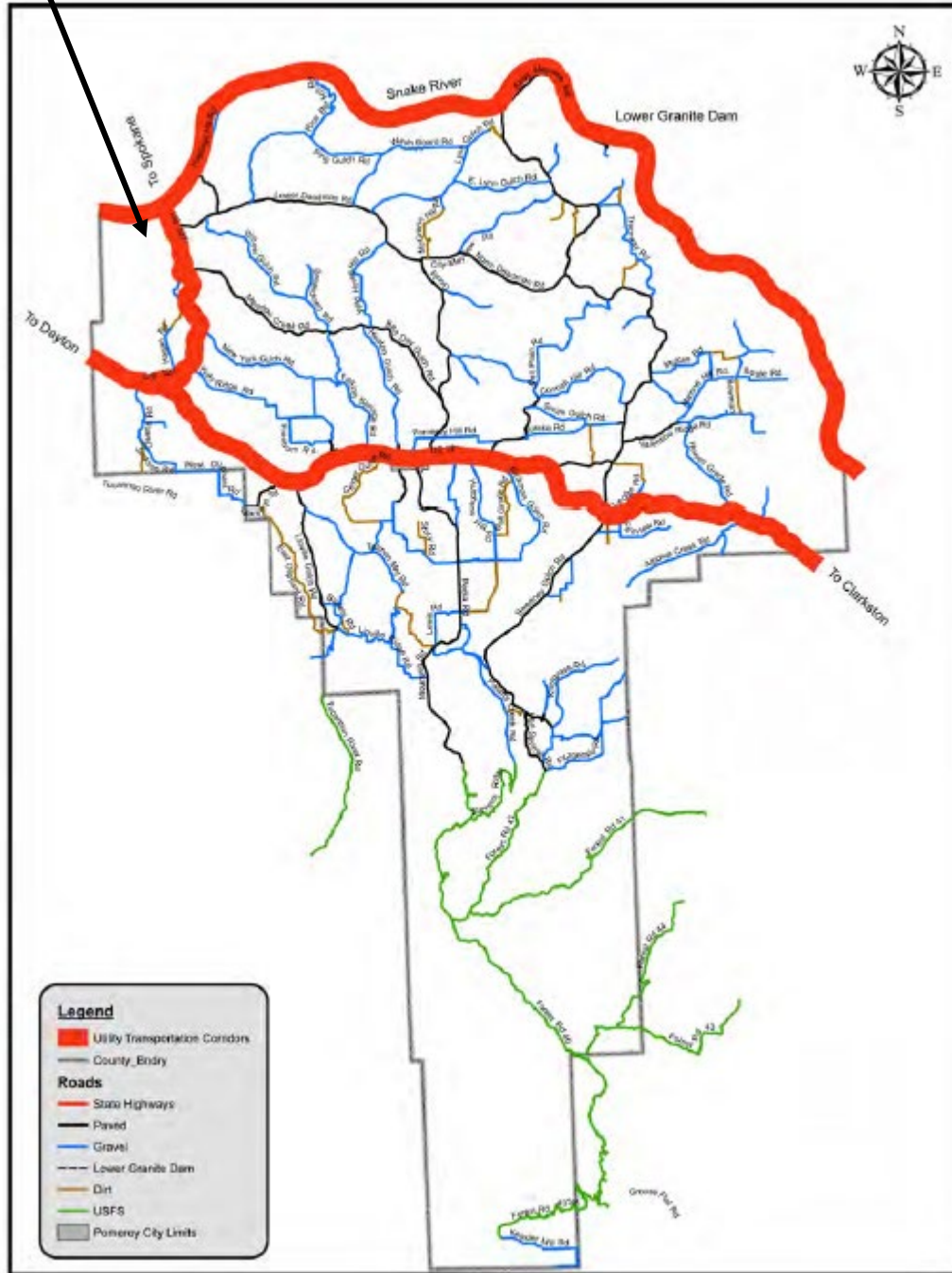


Exhibit 6
Cultural and Habitat Study Areas
Black lines (currently being studied); Orange lines (previously studied)

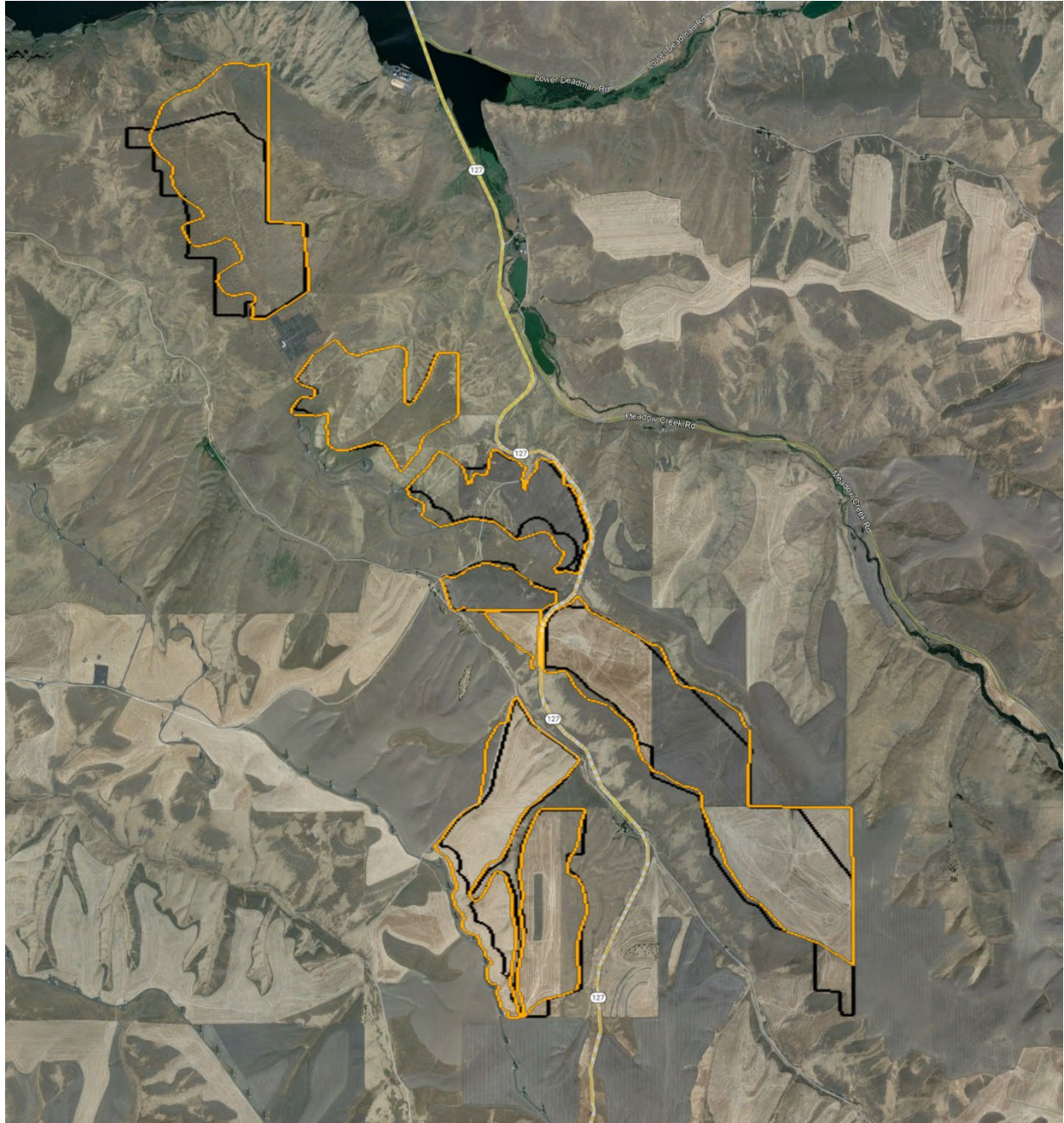


Exhibit 7

Legal Descriptions of the Project Area Properties

PARCEL NO. 2-013-40-017-1000: ALL OF SECTIONS 17 & 18

EXCEPT THAT PART LYING NORTHERLY OF THE FOLLOWING DESCRIBED LINE: BEGINNING AT A POINT LYING SOUTH 510 21'17" WEST, A DISTANCE OF 677.12 FEET FROM THE NORTHWEST COMER OF SAID SECTION 18; THENCE NORTH 78 020'41 " EAST 2,276.95 FEET; THENCE NORTH 87032'46" EAST 1,401.29 FEET; THENCE SOUTH 31004'18" EAST 455.33 FEET; THENCE SOUTH 85046'59" EAST 2,175.89 FEET; THENCE NORTH 62020'30" EAST 2,929.78 FEET; THENCE NORTH 81048'39" EAST TO THE EAST LINE OF SAID SECTION 8 AND THE POINT OF TERMINUS OF THE ABOVE DESCRIBED LINE.

NOTE: ALL BEARINGS ARE REFERRED TO THE WASHINGTON COORDINATED SYSTEM, SOUTH ZONE, UNLESS OTHERWISE SPECIFIED.

PARCEL NO. 2-013-40-020-1010 AND 2-013-40-021-1010: ALL OF SECTIONS 20 AND 21,

EXCEPT A PARCEL OF LAND LOCATED IN THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER AND THE NORTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SECTION 21, AND IN THE NORTHEAST QUARTER OF THE SOUTHWEST QUARTER OF SECTION 20, ALL IN TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, GARFIELD COUNTY, WASHINGTON, AND DESCRIBED MORE PARTICULARLY AS FOLLOWS:

COMMENCING AT THE NORTHEAST COMER OF THE NORTHEAST QUARTER OF SAID SECTION 21; THENCE SOUTH 89012'40" WEST ALONG THE NORTH LINES OF THE NORTHEAST QUARTER AND THE NORTHWEST QUARTER OF SAID SECTION 21 A DISTANCE OF 5316.63 FEET TO THE NORTHWEST COMER OF SAID NORTHWEST QUARTER OF SECTION 21; THENCE SOUTH 02003'15" EAST A DISTANCE OF 1893.36 FEET TO A 1 1/2 INCH IRON PIPE WITH WASHER STAMPED "XLG-190-1960"; THENCE SOUTH 14055' 45" EAST A DISTANCE OF 652.02 FEET TO A POINT ON THE NORTH RIGHT OF WAY LINE OF THE BONNEVILLE POWER ADMINISTRATION RIGHT OF WAY AND THE TRUE POINT OF BEGINNING FOR THIS LEGAL DESCRIPTION; THENCE NORTH 56011'51" EAST ALONG SAID RIGHT OF WAY LINE A DISTANCE OF 1112.23 FEET; THENCE DEPARTING FROM SAID RIGHT OF WAY AND RUNNING SOUTH 33048'09" EAST A DISTANCE OF 1500.00 FEET; THENCE SOUTH 56011'51" WEST A DISTANCE OF 1600.00 FEET; THENCE NORTH 33 0 48' 09" WEST A DISTANCE OF 1500.00 FEET TO A POINT ON THE AFOREMENTIONED RIGHT OF WAY LINE; THENCE NORTH 560 11'51" EAST ALONG SAID RIGHT OF WAY LINE A DISTANCE OF 487.77 FEET TO THE TRUE POINT OF BEGINNING.

PARCEL NUMBER 20134003520000000: WEST HALF OF SECTION 35, TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN.

PARCEL NO. 2-013-40-028-1000: ALL OF SECTION 28, TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN. SAVE AND EXCEPT THE FOLLOWING: BEGINNING AT A POINT ON THE SOUTH BOUNDARY LINE OF SECTION 28, IN TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN; SAID POINT BEING 2590 FEET EAST OF THE SOUTHWEST CORNER OF SAID SECTION 28; THENCE RUN NORTH 11° 45' EAST 560 FEET; THENCE NORTH 14° 15' EAST 560 FEET; THENCE NORTH 18° 15' EAST 277 FEET; THENCE SOUTH 71° 0' EAST 200 FEET; THENCE SOUTH 41° 15' EAST 46 FEET; THENCE SOUTH 77° 30' EAST 198 FEET; THENCE SOUTH 71° 30' EAST 322 FEET; THENCE SOUTH 86° 4' EAST 149 FEET; THENCE NORTH 81° 10' EAST 130 FEET; THENCE SOUTH 84° 45' EAST 212 FEET; THENCE SOUTH 64° 30' EAST 188 FEET; THENCE SOUTH 63° 30' EAST 310 FEET; THENCE NORTH 66° 45' EAST 195 FEET; THENCE NORTH 61° 30' EAST 185 FEET; THENCE NORTH 78° 0' EAST 300 FEET, MORE OR LESS, TO THE INTERSECTION WITH THE EAST BOUNDARY LINE OF SAID SECTION 28; THENCE SOUTH 1110 FEET TO THE SOUTHEAST CORNER OF SAID SECTION; THENCE DUE WEST 2673 FEET TO THE POINT OF BEGINNING.

PARCEL NUMBER 2-013-40-027-1000: NORTH HALF AND THE SOUTHWEST QUARTER, AND ALL THAT PART OF THE NORTHEAST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 2, TOWNSHIP 12 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, LYING NORTH AND EAST OF THE COUNTY ROAD RUNNING THROUGH SAID LANDS. PARCEL NUMBER 2-012-40-002-1000 ALL OF SECTION 27, TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, EXCEPTING THEREFROM THE NORTHEAST QUARTER OF THE NORTHEAST QUARTER OF THE NORTHEAST QUARTER, ALSO EXCEPTING THAT PORTION CONVEYED TO GARFIELD COUNTY IN THAT CERTAIN DEED DATED APRIL 21, 2011 AND RECORDED MAY 5, 2011 AT AUDITOR'S FILE NO. 20110218, RECORDS OF GARFIELD COUNTY, WA, FOR HAGEN ROAD AND THOSE PORTIONS CONVEYED TO THAT STATE OF WASHINGTON IN DEEDS RECORDED IN VOLUME 35 OF DEED, PAGE 508 (#7220), IN VOLUME 47 OF DEEDS AT PAGE 399 (#10199) AND VOLUME 48 OF DEEDS AT PAGE 1 (#10681) RECORDS OF GARFIELD COUNTY, WA.

PARCEL NUMBER 2-012-40-002-1000: NORTH HALF AND THE SOUTHWEST QUARTER, AND ALL THAT PART OF THE NORTHEAST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 2, TOWNSHIP 12 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, LYING NORTH AND EAST OF THE COUNTY ROAD RUNNING THROUGH SAID LANDS.

PARCEL NUMBER 2-013-40-027-1000: ALL OF SECTION 27, TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, EXCEPTING THEREFROM THE NORTHEAST QUARTER OF THE NORTHEAST QUARTER OF THE NORTHEAST QUARTER, ALSO EXCEPTING THAT PORTION CONVEYED TO GARFIELD COUNTY IN THAT CERTAIN DEED DATED APRIL 21, 2011 AND RECORDED MAY 5, 2011 AT AUDITOR'S FILE NO. 20110218, RECORDS OF GARFIELD COUNTY, WA, FOR HAGEN ROAD AND THOSE PORTIONS CONVEYED TO THAT STATE OF WASHINGTON IN DEEDS RECORDED IN VOLUME 35 OF DEED, PAGE 508 (#7220), IN VOLUME 47 OF DEEDS AT PAGE 399 (#10199) AND VOLUME 48 OF DEEDS AT PAGE 1 (#10681) RECORDS OF GARFIELD COUNTY, WA.

PARCEL NUMBER 2-013-40-028-4000: ALL THAT PART OF SECTION 28, TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE SOUTH BOUNDARY LINE OF SAID SECTION, 2590 FEET EAST OF THE SOUTHWEST CORNER OF SAID SECTION; THENCE NORTH 11° 45' EAST 560 FEET; THENCE NORTH 14° 15' EAST 560 FEET; THENCE NORTH 18° 15' EAST 277 FEET; THENCE SOUTH 71° 0' EAST 200 FEET; THENCE SOUTH 41° 15' EAST 46 FEET ; THENCE SOUTH 77° 30' EAST 198 FEET; THENCE SOUTH 71° 30' EAST 322 FEET; THENCE SOUTH 86° 04' EAST 149 FEET ; THENCE NORTH 81° 10' EAST 130 FEET; THENCE SOUTH 84° 45' EAST 212 FEET; THENCE SOUTH 64° 30' EAST 188 FEET; THENCE SOUTH 63° 30' EAST 310 FEET; THENCE NORTH 66° 45' EAST 195 FEET; THENCE NORTH 61° 30' EAST 185 FEET; THENCE NORTH 78° 00' EAST 300 FEET, MORE OR LESS, TO THE INTERSECTION WITH THE EAST BOUNDARY LINE OF SAID SECTION; THENCE SOUTH 1110 FEET TO THE SOUTHEAST COMER OF SAID SECTION; THENCE DUE WEST 2673 FEET TO THE POINT OF BEGINNING.

PARCEL NUMBER 2-013-40-034-1000: ALL OF SECTION 34, TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, GARFIELD COUNTY, WASHINGTON, SAVE AND EXCEPT THE SOUTH 550 FEET OF THAT PART OF THE SOUTHEAST QUARTER OF THE NORTHWEST QUARTER OF SAID SECTION, LYING EASTERLY OF PRIMARY STATE HIGHWAY NO. 3 AS TRAVELED IN 1958, ALSO EXCEPT THOSE PORTIONS OF SAID SECTION CONVEYED TO THE STATE OF WASHINGTON BY DEEDS RECORDED IN AUDITOR'S BOOK OF DEEDS 47, PAGES 373, 580, 637 AND 639. ALSO SAVE AND EXCEPT ALL STATE AND COUNTY ROADS.

PARCEL NUMBER 2-012-40-003-1000: ALL OF SECTION 3, TOWNSHIP 12 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, COUNTY OF GARFIELD, STATE OF WASHINGTON.

PARCEL NUMBER 2-013-40-034-1000: ALL OF SECTION 34, TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, GARFIELD COUNTY, WASHINGTON, SAVE AND EXCEPT THE SOUTH 550 FEET OF THAT PART OF THE SOUTHEAST QUARTER OF THE NORTHWEST QUARTER OF SAID SECTION, LYING EASTERLY OF PRIMARY STATE HIGHWAY NO. 3 AS TRAVELED IN 1958, ALSO EXCEPT THOSE PORTIONS OF SAID SECTION CONVEYED TO THE STATE OF WASHINGTON BY DEEDS RECORDED IN AUDITOR'S BOOK OF DEEDS 47, PAGES 373, 580, 637 AND 639.

ALSO SAVE AND EXCEPT ALL STATE AND COUNTY ROADS.

PARCEL NUMBER 2-013-40-032-1000: ALL OF SECTION 32 IN TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, COUNTY OF GARFIELD, STATE OF WASHINGTON.

PARCEL NUMBER 2-013-40-033-1000: ALL OF SECTION 33 IN TOWNSHIP 13 NORTH, RANGE 40 EAST, WILLAMETTE MERIDIAN, COUNTY OF GARFIELD, STATE OF WASHINGTON.