

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITING EVALUATION COUNCIL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

In the Matter of the Application of:

Scout Clean Energy, LLC, for Horse Heaven
Wind Farm, LLC,

Applicant.

DOCKET NO. EF-210011

REBUTTAL TESTIMONY OF
CHRISTOPHER WILEY ON BEHALF
OF SCOUT CLEAN ENERGY

REBUTTAL TESTIMONY OF CHRISTOPHER WILEY

ON BEHALF OF

SCOUT CLEAN ENERGY

EXH-1035_R

JUNE 30, 2023

STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000, Portland, OR 97205
Main 503.224.3380 Fax 503.220.2480

1 Q. Please state your name, occupation, and where you live.

2 A. My name is Christopher John Wiley and I am 27 years old. I am the owner/operator
3 of Bubba Wiley Wheat LLC, which is my dryland wheat operation in the Horse
4 Heaven Hills. I am the son, nephew, and grandson, respectively, of the three owners
5 of Wiley Ranches Inc. I split my time between running my personal operation and
6 working/volunteering for Wiley Ranches. Furthermore, I currently live on Wiley
7 Ranches in the same farmhouse my great-grandfather purchased nearly 80 years ago.
8 I have lived in the Horse Heaven Hills since I was two years old, with exception to
9 my five years studying at Washington State University, where I graduated in 2019
10 with a Bachelor of Science in Integrated Plant Science, majoring in Field Crop
11 Management.

12 Q. Please describe the purpose of this rebuttal testimony.

13 A. I am testifying in response to the pre-filed direct testimony of County planning
14 department employees Greg Wendt and Michelle Cooke.

15 Q. Are you able to answer questions under cross-examination regarding your testimony?

16 A. Yes.

17 Q. What is your relationship with Horse Heaven Hills?

18 A. I was eight months old the first time I rode in the combine harvester with my dad.
19 While I don't remember this event, I feel that my exposure to the dryland wheat
20 farming lifestyle at such a young age was a direct cause of my career choice,
21 obsession with farming, and passionate love for my family and the Horse Heaven
22 Hills community.

23 By the time I was five, I was learning to drive on field roads in my dad's
24 hand-me-down farm pickup. When I was about seven, my siblings and I were old
25 enough to rogue rye and hoe thistles. I quickly grew to appreciate my grandpa's
26 incredible work ethic as this old man worked circles around us. It was 85 degrees out

1 at 8 a.m. and with dirt in his eyes, ears, nose, and teeth my grandpa still took the time
2 to smile at us as we learned to work in the hot August Horse Heaven sun.

3 When I turned 13, I was driving 11-hour shifts on the combine harvester—a
4 rite of passage for any Horse Heaven child according to my grandpa. And by the time
5 I was 18, I carried my grandfather’s casket to its resting place, under the shadow of
6 the Horse Heaven Hills in the Prosser Cemetery.

7 When I was 23, my childhood dreams came true when a dear friend of my
8 grandpa agreed to lease out his Horse Heaven wheat farm to me, so he could retire
9 and spend his golden years with his wife instead of a tractor seat. I secured an
10 operating line of credit, drained my savings for a down payment on a 30-year-old
11 tractor, and with a leap of faith Bubba Wiley Wheat was born. Wiley Ranches was
12 struggling and could not afford to pay me a working wage. But I did the majority of
13 the labor for both farm operations because my father’s physical health was failing at
14 48 years of age. To make ends meet, I worked a part-time job in town until I could
15 harvest my first crop and pay off my operating loan.

16 Today, I am 27 years old. I am currently preparing for my third harvest and
17 Wiley Ranches’ 78th harvest. I am blessed with a beautiful wife and a baby on the
18 way. In my free time, I volunteer for the Horse Heaven Fire department (also known
19 as Benton County District Five). I also run the County Well Water District, which
20 supplies drinking water to Horse Heaven residents who do not have access to a water
21 well on their property. In the winter, to fill my freezer, I chase Horse Heaven mule
22 deer and pheasants with my brother in the sagebrush scablands and canyons that
23 outline the fields my grandpa and dad taught us to work in so many years ago.

24 In short, the Horse Heaven Hills is as important to my physical identity as is
25 my long hair or the scars and calluses on my hands. My entire family has made
26 sacrifices for eight decades so that I can live and work in the Horse Heaven Hills.

1 And someday I will die here, just like my great-grandfather and grandpa, surrounded
2 by tough, intelligent, hardworking Horse Heaven children and grandchildren. And our
3 family legacy will live on, tied to the Horse Heaven Hills indefinitely.

4 Q. How long have you and your family been farming in the Horse Heaven Hills area?

5 A. My great-grandfather John Wiley purchased farmland in the Horse Heaven Hills and
6 established Wiley Ranches in 1945. Following his untimely death in 1976, my young
7 grandfather took over farm operations. And through drought, recession, stagnant
8 wheat prices, inflating input costs, and family turmoil, he led Wiley Ranches into the
9 20th century. In 2014, my father took over operations after the death of his father.
10 Today, my father and I work together to complete all the farmwork on about 8,000
11 acres between our two operations.

12 Q. What is your relationship to the Horse Heaven Wind Farm project (the “Project”)?

13 A. Wiley Ranches and Pearson Farms (the owner of the farmland I lease) both are
14 participating landowners in the Project. Additionally, I publicly became an advocate
15 for the Project in 2021 when I wrote an editorial piece outlining the life-changing
16 benefits the Project would provide to the involved families farming in the Horse
17 Heaven Hills. My goal was to draw state-wide attention to the debate surrounding the
18 Project because I felt it was and is being misrepresented by the Benton County
19 government to the public.

20 Q. Which crops do you and your neighbors farm?

21 A. With exception to some neighbors to the south with access to irrigation water, my
22 neighbors and I in the Horse Heaven Hills almost exclusively grow wheat. Because of
23 its winter hardiness and severe drought tolerance, it is one of the only crops that can
24 be grown off of the 6-8 inches of annual precipitation the area receives. In
25 comparison, wheat crops grown less than 100 miles away in the Palouse are grown
26 off of 20+ inches of annual precipitation.

1 Q. What portion of your property would you be able to continue farming during the
2 construction and/or operation of the Project?

3 A. After completion of the Project, we will continue to farm the entirety of our farmland,
4 minus a small amount removed for the wind towers and graveled service road. Most
5 of the lost acreage will be from the service roads, not the towers. However, the
6 service roads will also serve as nice, graveled field roads for the landowners to move
7 equipment down and haul their grain out of the field on. Our current field roads are
8 more like a wilderness two track, compacted silt and sand that gets pulverized into
9 powder when driven on. Our current field roads are prone to wind erosion, or water
10 erosion if located on any degree of slope. They are also prone to holes and ruts that
11 translates to more wear and tear on vehicles and equipment and more time and money
12 spent playing mechanic instead of farmer.

13 With that being said, the graveled service roads included with the Project
14 serve more as an enhancement to the property than as an obstacle to farm around. It is
15 estimated that on average 0.5-1.0 acres will be taken out of production for each wind
16 turbine in service. This includes the acreage used for service roads and facilities. This
17 means at least 99.6% of our farm will remain normal, functioning dryland wheat farm
18 ground for the duration of the Project.

19 Q. Do you agree with the conclusion on page 1 of Mr. Wendt’s testimony that
20 construction and operation of the Project is inconsistent with the rural character of the
21 area, or with the statement on page 4 of Ms. Cooke’s testimony that the Project will
22 “make it extremely difficult to sustain economically viable agricultural activities” in
23 the Horse Heaven Hills region? Please explain.

24 A. I disagree with Mr. Wendt’s statement that construction and operation of the Project
25 is inconsistent with the rural character of the Horse Heaven Hills, especially because
26 the Project will provide economic stability to our rural community like it has never

1 seen since the first homesteader ran a plow across virgin Horse Heaven soil. I believe
2 the Project complements the rural character of the area both in its physical presence
3 and economic benefit. In fact, I believe the Project is the single change that can
4 protect the rural character of the Horse Heaven Hills for the foreseeable future.

5 The rural character of the Horse Heaven Hills does not just consist of what
6 covers the land, but also who resides on the land. The Horse Heaven Hills has been
7 home to my family since Badger Road wasn't even graveled, let alone paved, and the
8 western edge of Kennewick started a mile east of the grain elevator on Clearwater.
9 Throughout my grandfather's, father's, and especially my own life, we have watched
10 thousands of acres of both agricultural and sagebrush-covered land be bulldozed for
11 the construction of housing development after housing development. I am unsure as
12 to whether or not there was a net positive impact of all of the urban expansion of the
13 Tri-Cities, but regardless, it's done now. All of those homes lie on land that used to
14 have rural character, and all of those homes require power and other services. Many
15 of the very people who occupy those homes view the Horse Heaven Hills as nothing
16 more than a rural landscape for them to ride their bikes through or enjoy looking at
17 from their back porch. I love looking at it too. I not only view the landscape as home,
18 I view it as my provider, the thing keeping me and my family alive. Walking around
19 the sandy loam off Travis Road with my siblings is where I learned more than I have
20 anywhere else or since in life. But myself, my family, and all of the neighboring
21 landowners who have approved countless revisions to our lease agreements over
22 more than a decade since the Project was first proposed know that the "eyesore" of
23 these wind turbines is a minor inconvenience compared to the economic benefit it
24 will provide to us landowners leasing land to Scout Clean Energy, as well as anyone
25 who uses electricity in Benton County. To be frank, if the landowners participating in

26

1 the Project did not believe it was in their family and community’s best interest, they
2 would not be participating in the Project and you would have never heard of it.

3 Although not as populated as it was in my childhood, or generations before
4 me, Horse Heaven Hills is a community, not a legal designation in a court document.
5 As a child, we experienced rural character at Christmas and Halloween parties at the
6 Horse Heaven Community Hall. But after a wave of kids getting older and moving
7 away, and the elders passing away, these halted. This is a progression that has
8 happened on Horse Heaven, and across rural America as long as it’s been settled. The
9 Project offers a chance for us to sustain our culture, our “character,” and our
10 community. Nor is it the first industrial project to do so.

11 For example, take a look at the expansive Horse Heaven Hills irrigation
12 project that started in the 1970s. Since then, tens of thousands of acres of dryland
13 wheat and sheep grazing land have been converted into center pivot irrigation circles,
14 vineyards, water ponds, storage and packing facilities, and wineries. This irrigated
15 agricultural land is where a vast majority of Benton County’s \$900 million in
16 agricultural revenue is generated, as stated by Ms. Cooke. However, she conveniently
17 leaves out the fact that the Project is working with landowners in the dryland wheat
18 growing region of Horse Heaven, not the high-producing irrigated land further south.
19 Regardless of this omission, a superficial response to that irrigation project would be
20 to say it was inconsistent with the rural character of the land. But in reality, it brought
21 wealth and prosperity to dozens of farming families who, like mine, continue to farm
22 and plan to keep their family legacies alive for years and years to come. Furthermore,
23 by diversifying their farm operations through the irrigation project, those farms were
24 able to intensify their farming operation. As a result, hundreds, if not thousands, of
25 families are fed by employment on the irrigated oasis located on the southern end of
26 the Horse Heaven Hills. Lastly, the irrigation project gave birth to a revolutionary

1 little thing known as the Horse Heaven Hills American Viticulture Area. Thousands
2 of acres of grapes, contracted to dozens of Washington wineries, helped shape the
3 Washington wine industry into the powerhouse it is today, as well as provide identity
4 and celebration for the uniqueness of wine made from Horse Heaven grapes. Sadly,
5 today I believe this irrigation project that breathed life into Ms. Cooke’s family farm
6 would be considered inconsistent with the rural character of the land according to Mr.
7 Wendt’s definition.

8 By comparison, I would like to demonstrate how the Project could also help
9 bring prosperity to Horse Heaven family farms, stabilize and diversify their operation,
10 and, most importantly, keep the land in agricultural use for generations to come. To
11 do this, I would like to compare what our current farming operation is like to our
12 vision for the future working with Scout Clean Energy.

13 For my family, dryland wheat farming in the Horse Heaven Hills has hit a
14 plateau in terms of advancement. We have largely figured out how to reduce tillage
15 and prevent erosion and air quality concerns. We have invested in the precision
16 agricultural technologies we can afford. We are working on maximizing yield with
17 the extremely low precipitation we receive. We understand that the health of our soil
18 is the lifeline to our operation, so we try to conserve organic matter, balance soil pH,
19 and fertilize the soil that will feed our family for generations to come. And despite all
20 the progress we have made since 1945, most days it feels like we are barely getting
21 by.

22 Wheat prices today are within a few dollars of what they were in 1974.
23 Meanwhile, input costs like fuel have increased nearly ten-fold since then. The story
24 is similar with other production costs such as fertilizer, crop protection agents,
25 insurance, and machinery prices. So, the result is that for every inch we progress in
26 terms of crop production, the cost of production increases by a yard.

1 Another problem is that our rainfall is so unpredictable. In 2021, Bubba Wiley
2 Wheat grew its first ever crop with 4 inches of annual precipitation. It was one of the
3 worst wheat crops on Horse Heaven anyone alive could remember. The following
4 year in 2022, we received 11 inches of precipitation and grew one of the highest
5 yielding crops in the history of the region. The result of those two years was basically
6 a wash. In order to survive as a wheat farmer on Horse Heaven, we have to manage to
7 survive the bad years so that we are actually in position to profit from a good year.
8 Meanwhile, the needs of my family do not change from year to year based on the
9 weather.

10 To face the problems affecting our crop production system, there are two main
11 ways my neighbors and my family have adapted. The first way is to increase the size
12 of our operation. By spreading certain fixed costs across a larger number of acres, it
13 makes sense that a bigger farm can support a family where a smaller one cannot.
14 However, there is no new farmland coming into production in the Horse Heaven
15 Hills. So, this means any acreage my family would potentially gain is actually lost
16 acreage from one of our neighbors. This does not sound like an actual solution, but
17 rather a community perpetually cannibalizing itself until it is no longer a community.
18 And unfortunately, this is the easier option of the two ways to adapt.

19 The second way to adapt to shrinking profits is to learn how to spend as little
20 money as humanly possible. On Wiley Ranches, my family manages this by patching
21 and repairing old and outdated farm equipment, vehicles, houses, structures, storage
22 facilities, and tools over and over again. This is the equivalent of catching sand
23 coming out of a colander and pouring it back in the top—no matter how hard you try
24 or how fast you work, eventually you are going to have to get new sand.

25 Now that I have analyzed how current farming conditions are on Horse
26 Heaven, it is easier to imagine how our farm could be improved with an additional

1 stable source of income, like that which we would receive for our participation in the
2 Project:

- 3 • 30 years of repairs to our grain elevator that have been put off suddenly
4 becomes a reasonable business expense.
- 5 • Our 50-year-old seed trucks will finally be able to retire and enjoy a well-
6 earned rest.
- 7 • Our 30-year-old workhorse wheel tractor could be updated with something
8 more powerful, fuel efficient, and compatible with advancing precision
9 agricultural systems.
- 10 • 70-year-old farm implements could be replaced with safer, more precise
11 modern machinery that is currently out of our price range. This includes
12 replacing our aging no-till equipment such as our sprayer and no-till drill.
- 13 • Perhaps the next time my great-grandfather’s shovel, hoe, hammer,
14 screwdriver, chisel, or grinder breaks, we could put it in a museum where
15 it belongs instead of welding it back into shape.
- 16 • A remodel of my parents’ 100-year-old home may be an option we can
17 reasonably afford.
- 18 • We could hire an additional farmhand, so my father doesn’t have to keep
19 putting off long overdue knee, shoulder, and back surgery.
- 20 • College funds may be an option for my children, whereas my siblings and
21 I had to manage on scholarships, financial aid, and personal loans.
- 22 • I could draw a livable wage for my work on Wiley Ranches, without it
23 having to come out of the pocket of another family member. This would
24 help Bubba Wiley Wheat, in addition to Wiley Ranches, invest in no-till
25 equipment.

1 Lastly, a family that is financially stable has time to actually function like a normal
2 family, instead of a survival mechanism. Extended family could come home to the
3 farm, where there is currently no additional housing or work opportunities.

4 Viewed in this light, it is easy to see that the effect of the Project on the “rural
5 character” of the land and, more importantly, of its residents is similar to that of the
6 irrigation project that changed the Horse Heaven Hills for the better, so many years
7 ago.

8 In closing, the determining factor of whether something is consistent with the
9 rural character of an area depends on what you consider that rural character to be. I
10 consider rural character to be a thriving community of friendly small family farms
11 working side by side rather than in competition. Rural character is being generous and
12 neighborly, without expecting something in return, because it’s the right thing to do.
13 Rural character is working towards a common better future for a community as a
14 whole, rather than for personal gain. Rural character is being friends with the family
15 that lives a mile down the road because your families have worked together for
16 generations. And lastly, rural character is calling someone your neighbor who lives 30
17 miles away because you share a common goal, have lived through the same
18 hardships, and would make the same sacrifices to help your community. This
19 describes the history of the Horse Heaven Hills and is also the future I see for the
20 Horse Heaven Hills community.

21 On the other hand, perhaps Mr. Wendt’s or Ms. Cooke’s definition of rural
22 character is old, dilapidated farmhouses with no lights on in the windows and graffiti
23 on the walls. Maybe rural character is rusty old equipment getting cut up for scrap
24 because the farmer now works a double shift at Walmart to make ends meet. Is rural
25 character two behemoth corporate farms fighting for the scraps of the few family
26 farms who managed to hold on as long as they did? If your vision of the Horse

1 Heaven Hills is the cannibalized aftermath of a once great community, who no longer
2 has a culture or a history, then perhaps Benton County’s analysis is correct.

3 Q. How does your participation as a landowner within the Project area impact the
4 financial viability of your farm?

5 A. From an economic standpoint, the Project will allow us to keep 99.6% of our current
6 revenue stream intact, have no impact on our production expenses, and provide a
7 second revenue stream almost equal, if not equal, to our original revenue stream. And
8 most importantly, this new revenue stream pays the same amount every year
9 regardless of markets or weather. This is financial stability that my family could
10 never have dreamed of before.

11 From a logistical standpoint, the Project will allow us to pay off outstanding
12 debts. It will put my family in a position to update “the bones” of our farm operation
13 including grain storage facilities, mechanic shop, new barns or lean-tos to store our
14 vehicles in, water well, water trucks, seed trucks, tractors, etc. It will help us be ready
15 if an opportunity to expand our farm operation presents itself. It will let us develop a
16 capital buffer that is crucial in surviving bad production years. It will allow us to
17 invest in new agricultural technologies that will help us remain competitive
18 producers, optimize our operation, and take better care of the land that we steward.

19 Q. Would development of the Project help or hurt your family’s ability to continue
20 farming your land in the future? Please explain.

21 A. The development of the Project would absolutely help my family continue to farm
22 into the future. Because of the low impact on our actual farm operation, the Project
23 incentivizes our family to hold onto the land, rather than to sell it. However, there are
24 other serious pressures on farmers to give up farming and sell their property. The
25 most serious of these are urban sprawl and residential development.

26

1 Between 1990 and 2020, the population of the Tri-Cities more than doubled
2 from 150,000 to 303,000 residents. Today, the Tri-Cities incorporate 2,942.5 square
3 miles, which is equivalent to 1,883,200 acres. And the fact nobody is talking about is
4 that all of this land was either farmland, rangeland, or wildlife and wetland habitat
5 prior to becoming housing developments and commercial areas. Ms. Cooke and Mr.
6 Wendt both state that Benton County planning department has codes that protect
7 farmland from being converted to unsuitable uses, but meanwhile houses sprawl from
8 Kennewick into the Horse Heaven Hills year after year on Clodfelter and Badger
9 Road without sign of slowing down. This is an incredible contradiction and
10 hypocrisy.

11 Furthermore, on page 3 of her testimony, Ms. Cooke states that Benton
12 County has plans that “protect critical areas and visually prominent naturally
13 vegetated steep slopes and elevated ridges that define the Columbia Basin landscape.”
14 I find this statement ironic considering the tops of Badger, Candy, and Red
15 Mountains, as well north facing slope of the Horse Heaven Plateau, are currently
16 being scalped for the purpose of building million-dollar luxury homes.

17 Ms. Cooke also states “[t]he [Project] proposes a direct loss of 1% of the total
18 agricultural lands within Benton County. This is an unprecedented change that likely
19 exceeds the cumulative results of decades of ordinary permitting activity in the
20 GMAAD area.” Let’s compare the 6,500 acres in the Project that Ms. Cooke is
21 referring to with the 1,883,200 acres that makes up the Tri Cities, which has doubled
22 in size in the last three decades almost entirely on the agricultural land and wildlife
23 habitat that Ms. Cooke is claiming Benton County has protected. This sleight-of-hand
24 technique used by the County to scapegoat Scout Clean Energy is a thin veil that
25 poorly hides the County’s true long-term plans for the Horse Heaven Hills and its
26 farms. I find it audacious that representatives of Benton County can make such bold

1 assumptions concerning what the landowners participating in the Project plan to do
2 with their land without having a single conversation with us. I am the “legacy farmer”
3 she is claiming to protect. I am the fourth generation born and raised in the Horse
4 Heaven Hills who is advocating for the Project to ensure our farm is still here in the
5 upcoming century.

6 Q. As a member of Benton County Fire District Five, do you agree with Mr. Wendt’s
7 statement that local fire agencies will be unequipped to deal with potential fires
8 caused by wind turbines?

9 A. No. In my 27 years living on the Horse Heaven Hills, I have seen many destructive
10 wildfires consume both wheat crop and sagebrush habitat. I learned to fight fire from
11 my father and grandfather, who had 20 and 50 years of experience, respectively, with
12 Benton County Fire District Five. Furthermore, my great-grandfather was a forming
13 member of the organization in the 1950s. After moving back home from university, I
14 also joined Benton County Fire District Five and now have over three years of
15 experience there.

16 Over the years, every major fire we have faced on Horse Heaven has behaved
17 differently due to shifting winds, rolling topography, and other environmental factors.
18 A great example is the Yakitat fire we faced this summer that required state
19 mobilization. No local fire department in the state of Washington is equipped to fight
20 a fire on the steep north slope of the Horse Heaven ridge in 50+ mph winds, in an
21 area with no road access. No matter how a wildfire is started, they all need to be
22 treated equally in terms of danger.

23 Causes of wildfires on Horse Heaven have changed a lot over the years. In the
24 past, it was much more common for combine harvesters to malfunction and start fire.
25 With newer machines, we see this less and less. However, as housing developments
26 encroach farther and farther up the Horse Heaven ridge, we deal with more accidental

1 fires caused by careless recreation. In recent years, most of our fires have been started
2 by recreational shooting, fireworks, or ATVs. I believe these wind turbines will pose
3 a low risk of fire relative to other potential causes.

4 Q. How long has your family been working alongside Scout Clean Energy to bring the
5 Project to fruition?

6 A. Talks of the Project began nearly 15 years ago. At the time, I was a 13-year-old kid,
7 watching my grandpa and dad ponder the idea. Farmers in the Horse Heaven Hills
8 talked back and forth on the subject. It didn't take long to realize how beneficial the
9 Project would be for the community, especially when everyone realized wheat
10 farming and wind farms co-exist extremely well together. But interest in the Project
11 from energy companies ebbed and flowed over the years. To an impatient child, to me
12 it seemed like a pipe dream.

13 Here we are years later; I am a young man, my father is an aging man, and my
14 grandpa is gone. A few months before he passed away, my grandpa said something to
15 my dad and I that we did not quite understand at the time. He told us, "Whatever you
16 do, do not ever sell this place." He was of course referring to the family farm.

17 The farm was in financial trouble at the time. After he died, it felt like he was
18 saying that if the ship went down, we should go down with it like good captains. And
19 facing two years of terrible drought, it appeared that our captain had just caught the
20 last lifeboat.

21 As years have gone on, I have found wisdom in my grandpa's words that were
22 hidden in his 69 years of experience on Horse Heaven. He was not telling us to hang
23 on stubbornly to a bitter end. He was telling us to hang on because he knew that
24 someday in the near future, our land would be more profitable than the \$50 an acre
25 you can make off dryland wheat. And he knew that we would not have to sell our
26

1 land for housing to see that profitability. It appears that Scout Clean Energy is the
2 reason he was telling us to hang on.

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DATED: June 30, 2023.

STOEL RIVES LLP



TIMOTHY L. MCMAHAN
tim.mcmahan@stoel.com
WILLA B. PERLMUTTER
willa.perlmutter@stoel.com
ARIEL STAVITSKY
ariel.stavitsky@stoel.com
EMILY K. SCHIMELPFENIG
emily.schimelpfenig@stoel.com
Telephone: (503) 294-9517

Attorneys for Applicant