

# EXHIBIT R

## SCENIC RESOURCES

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## Introduction

This exhibit has been prepared to present information necessary to support EFSC findings pursuant to OAR 345-022-0080(1) and OAR 345-21-0010(1)(r)(A) through (F). As stated in 345-022-0080 to issue a site certificate, the Council must find that the design, construction, and operation of the Facility, taking into account mitigation, are not likely to result in significant adverse impacts to scenic resources and values identified as significant or important in local land use plans, tribal land management plans, and federal land management plans for any lands located within the analysis area described in the project order.

For this Exhibit the analysis area described in OAR 345-001-0010(2) and the study area described in OAR 345-01-0010(57) refer to the same areas and are defined as the area within the Facility site boundary and 10 miles outside the Facility site boundary (scenic resources study area). Figure R1 provides the location of resources addressed in relevant plans as well as the location of permitted and operating facilities within the 10-mile scenic resources study area.

### R.1 Analysis Methodology

Within the 10-mile scenic resources study area, scenic and aesthetic resources were identified using applicable federal land management plans, local land use plans, and responses received from agencies and residents during the Notice of Intent period. No tribal lands were identified within the study area; therefore, no tribal management plans have been included as part of this analysis. Tribal correspondence is provided in Exhibit S.

The analysis completed for this exhibit began with a ZVI analysis, using Environmental Systems Research Institute (ESRI) ArcGIS software, to identify the areas from which the proposed Facility components might be visible. The ZVI mapping data was used to identify areas for which local land use and federal land management plans have been prepared. Table R1 provides a list of the relevant plans. To assess the potential visibility of the generator lead line support structures, the maximum height (80 to 135 ft above grade) of the structures was assessed using the same ZVI methodology described previously for turbines.

It should be noted that the ZVI analysis is a conservative representation of potential viewing conditions. It is intended to represent line-of-sight conditions and does not account for factors that might obscure visibility such as weather conditions or vegetation. It considers all Facility components (wind turbines, 230-kV generator lead line, the O&M building, collector stations, access roads, etc.). However, due to the siting of turbines on ridges to maximize the wind resource, the turbines are generally the dominant feature in the area compared to other Facility features.

In analyzing the potential impacts under OAR 345-021-0010(1)(r), the Applicant followed established methods based on guidelines for evaluating visual resource impacts developed by the BLM, as other wind projects in Oregon have followed an acceptable methodology (BLM, 1986).

The sections that follow describe the potential impacts the Facility may have on the areas covered in the land use and federal land management plans listed in Table R1.

**R.2 Applicable Local, Tribal, and Federal Plans**

**OAR 345-021-0010(1)(r)(A)** *A list of the local, tribal and federal plans that address lands within the analysis area.*

**RESPONSE**

Table R1 presents the list of applicable federal and local plans that pertain to areas within 10 miles of the Facility site boundary. No tribal lands were identified within the study area; therefore, no tribal management plans have been included as part of this analysis. Tribal correspondence is provided in Exhibit S.

**Table R1: Applicable Federal and Local Plans that Pertain to Areas Within the Study Area**

Plan Category/Area/Applicable Plan(s)
<b>Local Land Use Plans</b>
<b><i>Gilliam County, Oregon</i></b>
Gilliam County Comprehensive Land Use Plan and Zoning Ordinance (Gilliam County, 2011)
Gilliam County Comprehensive Plan Land Use Plan and Gilliam County Zoning and Land Development Ordinance (Gilliam County, 2011)
<b><i>Morrow County, Oregon</i></b>
Morrow County Comprehensive Land Use Plan (Morrow County, 1986)
<b><i>Sherman County, Oregon</i></b>
Sherman County Comprehensive Land Use Plan (Sherman County, 2007)
<b><i>City of Arlington, Gilliam County, Oregon</i></b>
City of Arlington Comprehensive Plan (City of Arlington, 2003)
<b><i>Klickitat County, Washington</i></b>
Klickitat County Comprehensive Plan (Klickitat County, 1977)
Klickitat County Energy Overlay Zone Ordinance: Natural Resources/Energy Comprehensive Plan Amendment (Klickitat County, 2005)
Roosevelt Community Subarea Plan (Klickitat County, 1995)
<b>Federal Land Management Plans</b>
<b><i>John Day River</i></b>
Two Rivers Resource Management Plan Record of Decision (BLM, 2001a)
Omnibus Oregon Wild and Scenic Rivers Act of 1988 (WSA, 1988). Public Law 100-557, 102 STAT. 2782
Record of Decision John Day River Management Plan, Two Rivers, John Day, and Baker Resource Management Plan Amendments (BLM, 2001b)
<b><i>Cottonwood Canyon State Park</i></b>
Cottonwood Canyon State Park Draft Comprehensive Plan (OPRD, 2011)
<b><i>Oregon National Historic Trail</i></b>
Oregon Trail Comprehensive and Management Use Plan, Oregon National Historic Trail (NPS, 1999)
Oregon Trail Management Plan (BLM, 1993)
<b><i>Lewis and Clark Trail</i></b>
Lewis and Clark National Historic Trail, Comprehensive Plan for Management and Use (NPS, 1982)

**Table R1: Applicable Federal and Local Plans that Pertain to Areas Within the Study Area**

Plan Category/Area/Applicable Plan(s)
<b><i>Oregon State Byway Program March 1995</i></b>
Oregon Scenic Byway Users Guide (Oregon State Byway Program, 1995)
<b><i>Federal Aviation Administration</i></b>
FAA Advisory Circular, AC 70/7460-1K (FAA, 2007)

### **R.3 Identification and Description of Scenic Resources Identified as Significant or Important**

**ORAR 345-021-0010(1)(r)(B)** *Identification and description of the scenic resources identified as significant or important in the plans listed in (A).*

#### **RESPONSE**

The following sections describe the important or significant scenic and aesthetic resources identified in the plans listed in Table R1.

#### **R.3.1 Local Land Use Plans**

##### **R.3.1.1 Gilliam County Comprehensive Land Use Plan and Zoning Ordinances, Gilliam County, Oregon**

All lands within the Facility site boundary are located within Gilliam County. Gilliam County land use is administered by the Gilliam County Comprehensive Land Use Plan (2011) and the Gilliam County Zoning and Land Development Ordinance (2011). The following sections address sections of the plan relevant to scenic resources.

##### **R.3.1.2 Gilliam County Comprehensive Plan Goal 5**

Gilliam County Comprehensive Plan Goal 5 policies address conservation of open space and natural and scenic resources to comply with statewide planning Goal 5 (Open Spaces, Scenic and Historic Areas, and Natural Resources). A discussion of the relevant sections of Goal 5 in relation to the Facility follows.

#### **Finding 3:**

*“Rock outcroppings marking the rim and walls of steep canyon slopes as an important characteristic of the County’s landscape.”*

#### **Response to Finding 3**

Construction and operation of the Facility will not occur in areas of rock outcroppings; therefore, no change to these characteristics will occur. No significant impacts to rock outcroppings are expected.

#### **Finding 9:**

This finding describes portions of the John Day River that have been classified as Scenic or Natural River areas by the State of Oregon under provisions of ORS 390.805 through 390.925 and applies to the area known as the John Day State Wildlife Refuge. As described

in Exhibit L, ODFW manages the John Day Wildlife Refuge located along the lower mainstem of the John Day River, from the Columbia River about 84 miles to Thirtymile Creek. It includes a 0.25-mile corridor on each side of the river, measured from the mean high water line from the Columbia River upstream to Thirtymile Creek. Its primary purpose is to protect wintering and nesting waterfowl. Policies included in this part of the plan include:

**Finding 9 Policy A:** The County plan includes the following wording: “The State Scenic Waterway designation applicable to this area of the County was enacted by ORS 390.825 (6) and the authority for the regulation of uses within said area is vested with the State Department of Transportation by ORS 390.845. Pursuant to ORS 390.845, said state agency has adopted and enforces regulations governing all uses within said area; said regulations set forth in OAR Chapter 736, Division 40. Said regulations are intended fully to protect and enhance those values which caused such scenic waterway area to be so designated; i.e., aesthetic, scenic, fish and wildlife, scientific and recreation features. The adequacy of such regulations to fully protect the subject resource is attested to in the 1979 Wild and Scenic River Report and Environmental Assessment for the subject area as conducted by the National Park Service. In compliance with OAR 660-16-005 and 660-16-010, said NPS Report and Environmental Assessment is hereby adopted by reference as though set forth in full herein, and is concluded to fully comply the County’s responsibilities relative to inventory requirements, Goal 5 process requirements, identification of conflicting uses, ESEE analysis requirements, and resource protection requirements. The NPS Report for the Natural and Scenic River areas complies with Goal 5 because no new structures or improvements which are visible from the river, other than those erected and made in connection with agricultural uses, or those needed for public recreation or resource protection will be permitted. Additional dwellings and commercial public service facilities, including resorts and motels, lodges and trailer parks, which are visible from the river, will not be permitted.”

**Response to Finding 9 Policy A:**

The Applicant contacted Gilliam County to discuss the Facility’s consistency with this policy in terms of construction and operation of the Facility (Anderson, 2011). The County confirmed that the intent of the policy is to provide a natural experience as users float, fish, camp, and hike along the river. The County is aware that existing turbines are visible from lookouts and higher elevations above the river; however, because the closest turbine proposed by the Facility is approximately 4 miles away, it is unlikely that it will be visible from the river. The County informally confirmed that the Facility will be consistent with this policy due to the distance of the turbines from river.

**Finding 9 Policy B:** The County plan includes the following wording: “Natural River Area: The segment of the scenic waterway beginning at the intersection of West to East Centerline of Section Five (5), Township Five South, Range Nineteen East of the Willamette Meridian (T 5S, R 19E, W.M.), Sherman County, extended easterly from the center of said section to its intersection with the John Day River, near the mouth of Thirtymile Creek; thence downstream approximately 31 miles to the North Boundary of the Southwest Quarter (SW ¼) for the Southeast Quarter (SE ¼) of Section Twenty-four (S 24), Township Two South, Range Eighteen East of the Willamette Meridian (T 2S, R 18E, W.M.), Sherman and Gilliam Counties, near East Ferry Canyon, is classified as a Natural River Area. Within this area, no new structures or improvements, which are visible from the river, other than those, erected or made in connection with agricultural uses, or those needed for public recreation or resource protection will be permitted. Additional dwellings and commercial public

service facilities, including resorts and motels, lodges and trailer parks which are visible from the river will not be permitted.”

**Response to Finding 9 Policy B:**

This policy is not applicable to the proposed Facility because the segment designated as the natural river section is not located within the 10-mile scenic resources study area for this exhibit.

**Finding 9 Policy C:** The County plan includes the following wording: “Scenic River Areas: The segments of the scenic waterway upstream and downstream from the designated Wild River Area are classified as Scenic River Areas. Within these areas, no new structures or improvements which are visible from the river, other than those erected or made in connection with agricultural uses, or those needed for public recreation or resource protection will be permitted. Additional dwellings, other than those necessary to existing agricultural uses, and commercial public service facilities, including resorts and motels, lodges and trailer parks which are visible from the river, will not be permitted.”

**Response to Finding 9 Policy C:**

Federal and state classifications for the John Day River are discussed further in the sections that follow. However, similar to the conclusion presented under Finding 9 Policy A, because Facility turbines will not be visible from the river and the closest turbine is approximately 4 miles away, significant impacts to this resource from the Facility are not expected.

**R.3.1.3 Morrow County Comprehensive Land Use Plan, Morrow County, Oregon**

Although the Facility site boundary is located entirely within Gilliam County, the study area extends into Morrow County, as shown in Figure R1. Land use in Morrow County is administered by the Morrow County Comprehensive Land Use Plan (Morrow County, 1986) which states “Morrow County contains a variety of landscapes, many of which may be considered to be scenic.” However, there are no sites specifically designated as significant or important in the plan. Therefore, because no specific scenic resources have been specifically identified for Morrow County and the Facility is not located in Morrow County, significant impacts are not expected.

**R.3.1.4 Sherman County Comprehensive Land Use Plan, Sherman County, Oregon**

The study area encompasses a small section of northeastern Sherman County, as shown in Figure R1. Land use in Sherman County is administered by the Sherman County Comprehensive Land Use Plan (Sherman County, 2007). The following sections pertain to scenic resources:

Physical Characteristics Section XI, Finding XI: “Rock outcroppings, trees, the John Day River Canyon, and the Deschutes River Canyon are all-important features of the County's landscape. In addition, the Oregon State Department of Transportation has designated certain segments of I-84, U.S. 97, ORE 206, and ORE 216 as Scenic Highways.”

Physical Characteristics Section XI, Finding XIII: “Citizens of the State passed a ballot measure, which was later enacted into law (ORS 390.805 through 390.925), which designated the lands within one-quarter mile of the Deschutes and John Day Rivers

bordering Sherman County to be within the Oregon State Scenic Waterway System. That portion of the John Day River has not been included.”

Physical Characteristics, Section XI, Goal VI, Policy VII: “Trees should be considered an important feature of the landscape and therefore the County Court shall encourage the retention of this resource when practical.”

Energy, Section XV, Goal I, Policy I: “Cooperate with public agencies and private individuals in the use and development of renewable resources.”

The Deschutes River is located outside the study area and therefore is not discussed further. Federal and state classifications for the John Day River are discussed further in the sections that follow. In terms of rock outcroppings and trees, no specific resources are identified by the County plan, and construction of the Facility does not propose removal of these features in Sherman County. In terms of Section XV, Goal I, the EFSC process requires cooperation with public agencies and private individuals for development of a renewable resources goal. The EFSC process includes substantial coordination with public agencies and private individuals. Significant impacts are not expected to protected resources located in Sherman County.

#### **R.3.1.5 City of Arlington Comprehensive Plan, City of Arlington, Oregon**

The City of Arlington is located approximately 7 miles north of the Facility site boundary but within the 10-mile scenic resources study area. Land use in the City of Arlington is administered by the City of Arlington Comprehensive Plan (2003). The following sections pertain to scenic resources:

Goal 5, Open Space, Scenic and Historic Areas, and Natural Resources: Subtopic A: Includes an inventory of land needed or desirable for open space, which identifies the Horse Heaven Hills on the Washington side of the Columbia River, and vast areas of open space within sight of almost every house in the town.

Goal 5, Open Space, Scenic and Historic Areas, and Natural Resources: Subtopic F: Identifies the views outside the City of Arlington to the east, west, and north as scenic views and adds that the topography of the City tends to protect those views as development occurs.

The proposed Facility is not located within the Arlington city limits. In addition, it is unlikely that Facility components will be visible from residences within the city limits as the Facility is located approximately 7 miles from the city limits. Due to the rolling topography in the area and distance from the Facility, significant impacts are not expected.

#### **R.3.1.6 Klickitat County Comprehensive Plan, Klickitat County, Washington**

The 10-mile scenic resources study area encompasses a small section of southern Klickitat County. Land use planning in Klickitat County is administered by the Klickitat County Comprehensive Plan. The Facility is not located within the State of Washington or Klickitat County. Although the comprehensive plan and supporting ordinances were reviewed, neither identifies any specific scenic resources or views. Therefore, no further analysis relating to Klickitat County is provided in this Exhibit.

### **R.3.2 Federal Land Management Plans**

#### **R.3.2.1 Lands Managed by the BLM**

The Federal Land Policy and Management Act of 1976 requires the BLM to protect the quality of scenic values on public lands (43 USC 1701). The BLM has developed an analytical process that identifies, sets, and meets objectives for maintaining scenic values and visual quality. Resource classes serve two purposes: (1) an inventory tool that portrays the relative value of the visual resource, and (2) a management tool that portrays the visual management objectives.

The BLM uses the Visual Resource Management (VRM) system to classify scenery and provide a framework for managing visual impacts of activities occurring on BLM-administered lands. VRM classes range from Class I to Class IV, with Class I to have the least amount of visual change. Class designations are derived from an analysis of scenic quality (rated by landform, vegetation, water, color, influence of adjacent scenery, scarcity, and cultural modification), a determination of viewer sensitivity levels (sensitivity to changes in the landscape), and distance zones (relative proximity of views of the proposed project; visual quality of a landscape, and user reaction, which may be magnified or diminished by the visibility of the landscape in terms of distance). The following sections provide a discussion of areas managed by the BLM.

#### **R.3.2.2 Two Rivers Resource Management Plan**

The 10-mile scenic resources study area includes a segment of the John Day River designated as a National WSR by the Omnibus Oregon Wild and Scenic Rivers Act (WSA) of 1988. The WSR designation applies to the river itself and to federal lands managed by the BLM that are within 0.25 mile of each bank. The agency responsible for implementation of the Act is the BLM. The *Record of Decision John Day River Management Plan, Two Rivers, John Day, and Baker Resource Management Plan Amendments* (BLM, 2001b) are the management documents that provide guidance in preserving this resource. Segment 1 of the WSR is within the study area, and is located east of Cottonwood Bridge where State Highway 206 crosses the John Day River. It extends 6 miles north of the Oregon Trail John Day Crossing Interpretive Site.

VRM inventories were completed by the BLM for all river segments, except Segment 8, and resulted in VRM classifications, which were documented in the *Record of Decision John Day River Management Plan, Two Rivers, John Day, and Baker Resource Management Plan Amendments* (BLM, 2001b).

The scenic resource within the Facility study area is classified in the *Record of Decision John Day River Management Plan, Two Rivers, John Day, and Baker Resource Management Plan Amendments* as a VRM Class II, a classification that permits management activities resulting in low level of change to retain existing character of the landscape, provided they do not attract the attention of the casual observer. However, a recent change in BLM policy classifies all lands within WSA as VRM Class I (BLM, 2011). The objective of VRM Class I is to preserve the existing character of the landscape; the landscape change should be very low and must not attract attention. The Two Rivers and John Day plan have yet to be amended to reflect the change in VRM classification for WSAs.

In addition to the WSR designation, Segment 1 of the river is also designated as an SSW pursuant to the Oregon State Scenic Waterways Act, ORS 390.805-390.925. The state identifies a designated boundary of 0.25 mile on either side of the scenic waterway, in which construction of buildings, roads, utilities, and other structures are required to be screened with vegetation and commercial public service facilities such as resorts and motels are not permitted.

The Facility will not be visible from the river or areas located within the 0.25-mile corridor governed by the WSR and SSW designations, with the exception of very limited and isolated areas in the southern portion of the segment. The turbines in this area will be approximately 4 miles away located on private lands in areas that are not governed by the BLM. Therefore, the Facility will be consistent with plans that govern this resource and construction and operation of the Facility will not result in significant adverse visual impacts on the area.

### **R.3.2.3 Horn Butte ACEC**

The Horn Butte ACEC is located approximately 5 miles northeast of the Facility site boundary. It was designated to protect nesting habitat for the long-billed curlew. Based on the ZVI analysis, a limited number of turbines will be visible at a small number of locations of the ACEC. Significant impacts are not expected at the ACEC as it is not protected or managed for scenic views. The EFSC came to a similar conclusion in the *Montague Wind Power Facility Final Order* (EFSC, 2010). Because the proposed Facility is located approximately 5 miles farther away than the Montague Wind Power Facility, the Facility is not expected to have a significant adverse visual impact on the area.

### **R.3.2.4 McDonald Crossing (i.e., John Day Crossing) and John Day Crossing Interpretive Site**

McDonald Crossing is located within the study area along the John Day River, approximately 4 miles west of the proposed Facility site boundary. Although no visible remnants of the Oregon Trail remain at the McDonald Crossing site, trail markers commemorate the trail's approximate route.

The John Day Crossing Interpretive Site is located on the west side of the river on BLM-administered land within the river canyon. BLM has classified the crossing area as a VRM Class II and the interpretive site area as a VRM Class III. The Class II objective permits management activities resulting in low levels of change to retain existing character of the landscape, provided they do not attract the attention of the casual observer. The Class III objective is to partially retain the existing character of the landscape and to contain a moderate level of change to the landscape. The Facility will not be visible from the John Day Crossing or Interpretive Site; therefore, no significant adverse impacts are expected.

### **R.3.2.5 Fourmile Canyon Interpretive Site**

The Fourmile Canyon Interpretive Site is located approximately 4 miles northeast of the Facility site boundary. The BLM's Fourmile Canyon Interpretive Site directs viewers to visibly intact remnant wagon ruts that extend up a hillside on the west side of Fourmile Road. The site is located on BLM land and is classified as a VRM Class III. As stated previously, the objective of this class is to partially retain the existing character of the landscape and to contain a moderate level of change to the landscape.

The ZVI analysis indicates that turbines will not be visible from the interpretive site. In addition, as listed in the U.S. Department of Interior, National Park Service *Oregon National History Trial Management Plan* (NPS, 1999), management is focused on historic preservation, not management of scenic resources. No development is proposed within the BLM jurisdictional land of the Fourmile Canyon site and immediate area; therefore, no significant adverse impacts are expected.

### **R.3.2.6 Cottonwood Canyon State Park**

Cottonwood Canyon State Park, which is scheduled to open in 2013, is located on the John Day River, approximately 8 miles from the Facility site boundary. Park lands include Cottonwood Bridge and J.S. Burres State Park which are located in the southwest corner of the future park. Creation of the new park is a joint effort between the BLM and Oregon Parks and Recreation Department (OPRD). The Cottonwood Canyon State Park Draft Comprehensive Plan, which was approved in August 2011, includes a number of trails and viewpoints (OPRD, 2011). As part of the planning effort, OPRD staff conducted scenic assessments using a visual rating system, different from that typically used on BLM lands. In the OPRD process, Cottonwood Canyon State Park lands are currently designated as Class III, Rural. The goal of this designation is to preserve and enhance the scenic character of Cottonwood Canyon.

The scenic landscape assessment led to the creation of 10 specific character areas. Although the plan provides classification for scenic resources within the ten character areas and identifies major viewpoint and screening areas, it does not give specific guidelines or designations to determine visual impacts. Of the 10 character areas, only Gooseneck Overlook will potentially have turbines visible. Given that the park plan does not provide specific guidelines for visual impacts, the Facility is located approximately 8 miles west, and visibility will be limited depending on atmospheric conditions, no significant adverse impacts are expected.

### **R.3.2.7 Scenic Highways/Byways**

The National Scenic Byways Program was established under the Intermodal Surface Transportation Efficiency Act of 1991, and reauthorized in 1998 under the Transportation Equity Act. Under the program, the U.S. Secretary of Transportation recognizes certain roads as National Scenic Byways or All-American Roads based on their archaeological, cultural, historic, natural, recreational, and scenic qualities. This program is voluntary and does not have specific regulations regarding visual impacts.

The Blue Mountain Scenic Byway was designated by the U.S. Forest Service in 1989 as a National Forest Scenic Byway and by ODOT as an Oregon State Scenic Byway in 1997. It is located by Oregon Route 74, approximately 5 miles east of the Facility within the scenic resources study area. Depending on location, a small number of turbines may be visible from sections of the byway. However, views of turbines will be limited due to topography and the fact that the byway is located in a canyon area. Given that a management plan does not exist for the byway, and views of the Facility will be very limited, no significant adverse impacts are expected.

### **R.3.2.8 Oregon National Historic Trail**

The following section includes discussion that is relevant to the ONHT guidelines. A more detailed impact description is provided in Exhibit S.

The 10-mile scenic resources study area includes an approximately 6-mile portion of the ONHT in the northern portion of the Facility boundary. The ONHT received federal designation as a “historic trail” under the National Trails System Act (NTSA) in 1978. The purpose of the historic trail designation on federal lands is to identify, preserve, and interpret the sites, route and history of the Oregon Trail.

The U.S. Department of Interior, National Park Service ONHT Comprehensive Management and Use Plan (NPS, 1999) identifies high-potential sites and segments. The focus of the plan is to provide for the development and maintenance of trails within federally administered areas, not the management of scenic resources. The Secretary of the Interior is directed to cooperate with and encourage those states through which the trails pass to operate, develop, and maintain any portions of these trails which are located outside the boundaries of federally administered areas. Therefore, the plan only applies to portions of the ONHT that are located on federal land.

Two sites are identified to be located within the study area: Fourmile Canyon and McDonald Crossing (NPS, 1999). As described in Section T.3.1, visible trail remnants are present; however, the location of the ONHT has not been clearly defined and traces of the route have been obliterated by agricultural practices, road construction, and urban development.

The scenic value associated with the ONHT is focused on the view of the visible trail remnants and ruts, not of the view from the trail to the surrounding area. The John Day Crossing and the Fourmile Canyon are considered significant important historic resources, but are not identified as scenic resources. Therefore, no significant adverse impacts to these resources are expected.

### **R.3.2.9 Oregon Trail Management Plan, BLM-Prineville District, Oregon**

Prepared by the BLM Prineville District, the *Oregon Trail Management Plan* is intended to meet the objectives of the Two Rivers RMP (BLM, 1993). The plan directs the land management regarding the interpretive site of the ONHT, historic preservation, and recreational land use. The plan proposes a “protective corridor extending 0.25 mile on either side of the main trail ruts” to protect the trail. This corridor will be dependent on public land holding that surrounds that portion of the trail.

The Facility will be located approximately 5 miles east of the McDonald Crossing and John Day Interpretive Site. The interpretive site has a BLM VRM Class III classification and the McDonald Crossing is classified as a VRM Class II.

According to the ZVI analysis, the Facility will not be visible from the interpretive site. In addition, development of the Facility will be located entirely on private land, outside the 0.25-mile corridor specified in this plan. For these reasons, the Facility will be consistent with the BLM visual land use classification.

### **R.3.2.10 Lewis and Clark National Historic Trail, Comprehensive Plan for Management and Use, National Park Service**

The Lewis and Clark National Historic Trail received federal designation as a “historic trail” under the NTSA in 1978. A portion of the trail is located outside of the 10-mile scenic resources study area. As previously discussed in Section R.3.2.7, management plans for historic trails focus on the protection of the physical trail and the artifacts associated with the trail and do not define the protection of scenic resources. Therefore, no visual impacts are anticipated due to the construction of the Facility.

### **R.3.2.11 Federal Aviation Administration Requirements**

The FAA requires turbines to be equipped with night lighting to reduce aviation risks as described in the FAA Advisory Circular, AC 70/7460-1K, Obstruction Marking and Lighting (FAA, 2007). The project will comply with FAA lighting requirements and will further consult with the FAA to determine which turbines will be equipped with lighting. As previously described in the local plans and policies, no local lighting requirements or regulations were identified as they pertain to lighting impacts to dark skies; therefore, no impacts were identified due to the required FAA lighting.

## **R.4 Significant Potential Adverse Impacts to Scenic Resources**

According to the visual analysis conducted within the 10-mile scenic resources study area, no visual resources were identified in any local, state, or federal plans that will create a significant adverse visual impact due to construction and operation of the Facility.

As previously discussed, Facility construction will not occur on federal or tribal lands. Portions of the Facility will be viewed from federally-held lands, although the BLM planning documents do not have jurisdiction outside BLM boundaries. In addition, the project will not be constructed within the 0.25-mile Oregon State Scenic Waterways boundary.

**OAR 345-021-0010(1)(r)(C)** *A description of significant potential adverse impacts to the scenic resources identified in (B), including, but not limited to, impacts such as:*

- (i) Loss of vegetation or alteration of the landscape as a result of construction or operation; and*
- (ii) Visual impacts of facility structures or plumes.*

### **RESPONSE**

#### **Loss of Vegetation and Alternation of Landscape**

Lands within the Facility site boundary are predominantly agricultural and mostly in dry land winter wheat production. There are also limited areas that consist of grasslands and shrub-steppe, which is utilized for cattle grazing and a few areas that may be CRP/CREP lands<sup>1</sup>. Lands within the Facility site boundary do not contain a high percentage of natural vegetation.

<sup>1</sup> The USDA-FSA cannot provide locations of Conservation Reserve Program (CRP/CREP) lands under the Freedom of Information Act (FOIA). Therefore, the location of lands currently enrolled in CRP/CREP is unknown.

The Facility layout was developed with care to site Facility components in areas that are in active agricultural use to avoid and minimize loss of vegetation to the greatest extent possible. Exhibit K provides more information about the limited amount of lands that will be converted to accommodate access roads, turbine pads, underground collector systems, substations, and the O&M building. In addition, the Applicant proposes to mitigate loss of vegetation, where necessary. More information on proposed mitigation is provided in Exhibit P. In terms of landscape alteration the discussion presented in the previous sections provides evidence to support the conclusion that construction and operation of the Facility will not alter the existing landscape in a manner that will result in potential adverse impacts to resources identified in applicable plans and policies listed in Table R1. For these reasons, significant potential adverse impacts as a result of vegetation removal to those scenic resources are not expected.

### Visual Impacts of the Facility

The visual impact analysis provided in Sections above considered all Facility components, although due to the area topography and line of sight to the nearest identified scenic resource, the only Facility components potentially visible will be turbines and generator lead line structures. Both will only be visible from limited locations; however, the FAA requires that turbines be equipped with lighting to minimize aviation risks. These lights may be visible from the ground in areas nearby, depending on the presence of visual obstructions such as topography, vegetation, and weather conditions. The number of turbines with lights and the lighting pattern will be determined upon consultation with the FAA.

The ZVI analysis found that there will be limited views of Facility turbines from areas near the John Day River. However, because the Facility will be located approximately 4 miles from areas identified in the plans discussed in Table R1, and existing turbines and transmission line support structures are already present and visible in the area, construction of the Facility will not substantially alter the existing character of the area.

## **R.5 Measures Proposed to Avoid, Reduce, and Mitigate Impacts**

**OAR 345-021-0010(1)(r)(D)** *The measures the applicant proposes to avoid, reduce or otherwise mitigate any significant adverse impacts.*

### **RESPONSE**

While no significant adverse impacts to scenic resources have been identified in the analysis completed to prepare this exhibit, the Applicant will incorporate BMPs into the Facility design:

- Most of the collector systems will be buried underground; however, where this is not feasible, portions may be carried overhead.
- Sensors and switches will be used to keep Facility lights off when not required.
- Mitigation for impacts to aviation safety resulting from Facility structures will be determined through consultation with the FAA during the micrositing process. An effort will be made to limit or minimize the visual effects of lighting, to the maximum extent possible in compliance with FAA requirements. Facility lights typically used to meet FAA

requirements will, to some extent, be shielded from ground level view due to a constrained (3 to 5 degree) vertical beam.

- Lighting fixtures, except those required by the FAA for safety purposes, will be shielded, hooded, and oriented towards the ground so that direct rays of light do not shine onto neighboring properties or serve as a source of light pollution.
- The Facility will be maintained and kept free of debris and unused or non-functioning equipment by storing equipment and supplies offsite (post-construction), and removing damaged or unusable equipment from the site.
- The Applicant will choose anti-reflective paint colors for turbine towers and blades that are a neutral non-obtrusive color such as white, off-white, or gray. Colors will reduce glare of the wind turbines, but will be required to meet the FAA's daytime lighting and marking standards. The O&M building will be painted earth-tone colors that are similar to colors in the nearby landscape (browns, beiges, or grays are preferable).
- There will be no signs posted that are visible from any public road, other than the manufacturer's or installer's identification, appropriate warning signs, or owner identification on a wind generator, tower, building, or other structure.

#### **R.6 Map Showing Location of Resources Identified**

**OAR 345-021-0010(1)(r)(E)** *A map or maps showing the location of the scenic resources described under (B).*

##### **RESPONSE**

Figure R1 shows the scenic resources that are located within the study area as well as the locations of other permitted or operating energy facilities with 10 miles of the site boundary.

#### **R.7 Monitoring**

**OAR 345-021-0010(1)(r)(F)** *The applicant's proposed monitoring program, if any, for impacts to scenic resources.*

##### **RESPONSE**

The Facility will not result in significant adverse impacts to scenic resources within the study area. Therefore, a monitoring program is not proposed.

#### **R.8 Proposed Site Certificate Conditions**

Similar to the conditions proposed by previously-approved wind energy facilities in the vicinity of the Facility, the Applicant proposes the following conditions:

##### **Condition 68**

*To reduce the visual impact of the Facility, the certificate holder shall:*

- (a) *Mount nacelles on smooth, steel structures, painted uniformly in a low-reflectivity, neutral white color.*

- (b) Paint the substation structures in a low-reflectivity neutral color to blend with the surrounding landscape.*
- (c) Not allow any advertising to be used on any part of the Facility.*
- (d) Use only those signs required for Facility safety, required by law, or otherwise required by the site certificate, except that the certificate holder may erect a sign near the O&M building to identify the Facility, paint turbine numbers on each tower, and allow unobtrusive manufacturers' logos on turbine nacelles.*
- (e) Maintain any signs allowed under this condition in good repair.*

**Condition 69**

*The certificate holder shall design and construct the O&M building to be generally consistent with the character of similar buildings used by commercial farmers or ranchers in the area and shall paint the building in a low-reflectivity, neutral color to blend with the surrounding landscape.*

**Condition 70**

*The certificate holder shall not use exterior nighttime lighting except:*

- (a) The minimum turbine tower lighting required or recommended by the FAA.*
- (b) Security lighting at the O&M building and substations, provided that such lighting is motion-sensor-activated and shielded or downward-directed to reduce glare.*
- (c) Minimum lighting necessary for repairs or emergencies.*
- (d) Minimum lighting necessary for construction directed to illuminate the work area and shielded or downward-directed to reduce glare.*

**R.9 Conclusion**

This exhibit provides the required information pursuant to OAR 345-022-0080(1) and OAR 345-21-0010(1)(r)(A) through (F). The Applicant has demonstrated through the discussion presented in this exhibit that the design, construction, and operation of the Facility will not result in significant adverse impacts to scenic resources.

## R.10 References

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**Figure**

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**Figure R1: Permitted, Operating, and Proposed Wind Facilities**



## **ATTACHMENTS**

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- Attachment R1: Morrow County Comprehensive Plan**
- Attachment R2: Sherman County Comprehensive Land Use Plan**
- Attachment R3: City of Arlington Comprehensive Plan**
- Attachment R4: Klickitat County Comprehensive Plan**