## Exhibit R Errata

Exhibit R provides an analysis of scenic resources for the Boardman to Hemingway Transmission Line Project (Project). Specifically, Exhibit R shows the Project-taking into account Idaho Power Company's (IPC) proposed mitigation measures near the National Historic Oregon Trail Interpretive Center and the Birch Creek Area of Critical Environmental Concern-is 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 for the Project.

Exhibit R of the Project's Application for Site Certification (ASC) was submitted to and accepted by ODOE in September 2018. Subsequent to ODOE's acceptance, ODOE provided requests for supplemental information. This errata sheet provides the requested information and documents associated changes to Exhibit R.

As you read this exhibit, please keep in mind that any additional information identified in this errata sheet shall prevail over the contents of the exhibit document itself.

Summary of Additional Information Provided for Exhibit R and Its Attachments

## Summary of Changes in Exhibit R

| Page \# | Section \# | Description of Change(s) Made |
| :---: | :---: | :---: |
| R-16 | 3.3 | Table R-1 modified to include discussion of Grande <br> Tour Route and add missing information for other <br> scenic byways. |
| R-35-37 | 3.3 .1 .3 | Grande Tour Route added to discussion of State <br> Scenic Byways. Text modified to better describe <br> location of all scenic byways in relation to the Project. |
| R-54 | 3.3 .2 | Table R-2 modified to include information on the Hells <br> Canyon Scenic Byway and the Grande Tour Route |
| Attachment R-2 | Maps | Scenic Resources Maps revised to include Oregon <br> Scenic Byways |
| Attachment R-3 | 3.0 | New Section 3.0A added to direct readers to Section <br> 3.0 Oregon Route 86 for discussion on impacts to the <br> Hells Canyon Scenic Byway. |
| Attachment R-3 | 3.0 | New Section 3.0B added to discuss impacts to |
| Grande Tour Route, Oregon Tour Route |  |  |$|$| Scenic Resources Maps revised to include Oregon |
| :---: |
| Scenic Byways |

## Specific Additional Information Provided for Exhibit R

## Page R-16, Section 3.3

Description of Additional Information: Table R-1 Table R-1 modified to include discussion of Grande Tour Route and add missing information for other scenic byways.

Text Edits Shown in Red

Table R-1. Scenic Resources Identified as Significant or Important

| Jurisdiction | Plan | Scenic Resources Identified? (Y/N) | Name of Scenic Resource | Location in Plan | Location of Scenic Resource | $\begin{gathered} \text { GIS ID } \\ \text { No. } \end{gathered}$ | Analyzed in Exhibit R? ( $\mathrm{Y} / \mathrm{N}$ ) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Oregon Department of Transportation | The Grande Tour Management Plan (La Grande/Union County Vistors \& Conventions Bureau 1988) | Y | Ladd <br> Marsh | Description of Qualities, Scenic Qualities | South of La Grande in Union County | The Grande Tour | Y |
| Oregon Department of Transportation | Hells Canyon Scenic Byway Corridor <br> Management Plan (Eastern Oregon Visitors Association/ Hells Canyon Scenic Byway Committee,2004) | Y | None specifically Identified | III. Intrinsic Qualities and Context Statement | East of Baker City on OR 86 | Hells Canyon Scenic Byway | Y |
| Oregon Department of Transportation | Journey Through Time Tour Route Management Plan (Michael Wetter and Associates1996) | Y | N/A | Background; Vision, Goals, Objectives | Outside of the analysis area | Journey <br> Through Time Tour Route | N |
| Oregon Department of Transportation | Blue Mountain Scenic Byway. No management or corridor plan | N | N/A | NA | Outside of the analysis area | Blue Mountain Scenic Byway | N |
| Oregon Department of Transportation | Elkhorn Drive National Forest Scenic Byway Management Plan (1996) | Y | N/A | Resource Inventory | Outside of the analysis area | Elkhorn <br> Drive <br> National <br> Forest <br> Scenic <br> Byway | N |

# Page R-35 through R-37, Section 3.3.1.3 

Description of Additional Information:_Grande Tour Route added to discussion of State Scenic Byways. Text modified to better describe location of all scenic byways in relation to the Project.

## State Scenic Byways

## Text Edits Shown in Red

The Oregon Scenic Byways Program administered by the Oregon Department of Transportation currently includes 24 highway routes that have been designated as All-American Roads, National Scenic Byways, Oregon State Scenic Byways, or Oregon Tour Routes (ODOT 2012). Portions of five of those routes are located within the analysis area: Hells Canyon Scenic Byway All-American Road and the Journey through Time, Blue Mountain, and Elkhorn Drive State Scenic Byways, and Grande Tour Route. Byway designation occurs as a result of applications submitted by local sponsor organizations that are reviewed by a Scenic Byways Advisory Committee for consistency with established statewide criteria. A key provision of the byways program is that roads designated as byways are to have corridor management plans developed by the local applicant. IPC reviewed the following management plans prepared for scenic byways within the analysis area to determine whether they identified scenic resources as significant or important.

## Grande Tour Route

The Grande Tour Route is an 80-mile loop route east and southeast of La Grande through parts of Union and Baker Counties. The route includes parts of OR 82, 203, and 237 and passes trough the towns of La Grande, Cove, Medical Springs, and Union. The tour route overlaps with a part of the Hells Canyon Scenic Byway east of La Grande. Most of the tour route is within the 10-mile analysis area.

The management plan for the Grande Tour Route identifies four goals for the route: 1) strengthen local economies; 2) build a bridge between urban and rural residents; 3) preserve and maintain the area's history; and 4) provide opportunities for education. The tour route management plan includes discussion of the general landscape and scenic qualities within the route region and identifies four specific locations of scenic quality. The four areas of scenic quality identified include Ladd Marsh Wildlife Management Area (WMA), Thief Valley Reservoir, Catherine Creek Summit, and the Ascension Chapel in the town of Cove.

The Ascension Chapel in the town of Cove is outside the analysis area. Catherine Creek Summit is about 7.8 miles from the Project and viewshed analysis indicates that the Project would not be visible from this portion of the tour route (Attachment R-6).

The Project would be visible from the portion of the Grande Tour Route near Thief Valley Reservoir where the tour route meets Thief Valley Road which provides access to a campground. The Proposed Route is located 3.75 miles to the west and a small portion would be visible from the east side of Thief Valley Reservoir.

The management plan identifies a viewpoint at Ladd Marsh State Wildlife Management Area which is managed by Oregon Department of Fish and Wildlife. The purpose of the wildlife management area is to protect wildlife and its habitat. No management standards or guidelines are identified for the protection of scenery. The plan recognizes the responsibilities of the state management agencies and the counties for land use planning and appear to defer
responsibilities regarding management of scenic quality. See Exhibit L, Protected Areas for additional information on The Ladd Marsh Wildlife Management Area.

The Proposed Route is closest to the Grande Tour Route at approximately 0.2 miles from Ladd Marsh. Viewshed analysis indicates that the Proposed Route would be visible to viewers in the vicinity of Ladd Marsh (Attachment R-6).

## Hells Canyon Scenic Byway All-American Road

The Hells Canyon Scenic Byway All-American Road is a 208-mile horseshoe shaped route through the northeast corner of Oregon. The route traverses' parts of Union, Wallowa, and Baker counties and includes parts of OR 82, OR 86, and USFS Road 39. The route passes through the towns of La Grande, Island City, Imbler, Elgin, Wallowa, Lostine, Enterprise, Joseph, Halfway, Richland, and Baker City. The scenic byway overlaps with a part of the Grande Tour Route near La Grande. A portion of the western part of the Hells Canyon Scenic Byway is within the analysis area. The Proposed Route crosses OR 86 at the very western portion of the scenic byway just east of Baker City.

## Journey through Time Scenic Byway

The Proposed Route, at its closest proximity to the byway, is located 2.9 miles distant. Viewshed analysis indicates that the Project would not be visible from any portion of the byway (Attachment R-6). Because the Project is not visible from the Journey Through Time Scenic Byway it is not assessed in the Exhibit R analysis.

## Blue Mountain Scenic Byway

The Blue Mountain Scenic Byway is a 145 -mile route through north-central Oregon, extending from Arlington on the Columbia River to Baker City. The route includes part of OR 74 and segments of multiple county highways and USFS roads. The eastern end of the byway overlaps with the Elkhorn Drive Scenic Byway. The 10-mile scenic viewshed analysis area of the Proposed Route crosses the byway in the vicinity of the town of Lexington. At this point the Proposed Route, at its closest proximity to the byway, is located approximately 9.5 miles distant. Viewshed analysis indicates that the project would not be visible from any portion of the byway (Attachment R-6). Because the project is not visible from the Blue Mountain Scenic Byway it is not assessed in the Exhibit R analysis.

## Elkhorn Drive Scenic Byway

The eastern part of the Elkhorn Drive Scenic Byway between Baker City and Haines is within the 10-mile viewshed analysis area. The Proposed Route, at its closest proximity to the byway is located approximately 2.9 miles distant in the vicinity of Baker City. Viewshed analysis indicates that the project would not be visible from any portion of the byway in this area near Baker City (Attachment R-6). Further north, in the vicinity of Haines, the Proposed Route is located approximately 7.3 miles distant from the byway. Some portion of the Proposed Route might be visible from this portion of the byway but would mostly be blocked by terrain. 1-84 is located between the viewer and Proposed Route. Because the Proposed Route's distance, and likely lack of visibility from the Elkhorn Scenic Byway it is not assessed in the Exhibit R analysis.

## Page R-54, Section 3.3.2

Description of Additional Information: Table R-2 modified to include information on the Grande Tour Route.
Text Edits Shown in Red

Table R-2. Visual Impact Assessment Results

|  |  |  |  | Par <br> Ch | t 1: B <br> aracte | seline stics |  | Imp | Ass | ent |  | art <br> D | Signif mina | $\begin{aligned} & \text { nce } \\ & \text { n } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\begin{aligned} & \frac{1}{\Omega} \\ & 0 \\ & 0 \\ & \end{aligned}$ |  | Landscape Character ${ }^{3}$ |  | Impact Duration ${ }^{5}$ |  | əळuечว əכ.nosəy |  |  | $\begin{aligned} & \stackrel{\circ}{㐅} \\ & \stackrel{\rightharpoonup}{J} \\ & 0 \\ & \hline 0 \end{aligned}$ |  |  |
| County - Union |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Hells Canyon Scenic Byway All-American Road | Crossed | 2 | $\begin{aligned} & 5-61 ; \\ & 5-32 \end{aligned}$ | C | Nat <br> App | T | LT | Med | Med | Low | Med | NP | CE | Less than Significant |
| Grande Tour Route, Oregon Tour Route | $\begin{gathered} 0.2 \\ \text { miles } \end{gathered}$ | 1 | $\begin{aligned} & 4-16 \\ & 4-26 \end{aligned}$ | C | Nat <br> App | T | LT | Med | Med | Low | Med | NP | CE | Less than Significant |

Map ID = The reference label used to indicate location of scenic resources on location and viewshed maps presented in Attachments R-2 and R-6a, R-6b, and R-6c.
${ }^{2}$ KOP = Key Observation Point
${ }^{3}$ Landscape Character Type: Nat App = Naturally Appearing; Cult = Cultural; Hist = Historical
${ }^{4}$ Observer Characteristics: T= Transient; S = Stationary
${ }^{5}$ Duration: LT = Long-term; ST= Short-term
${ }^{6}$ Context: NP = Not Precluded; P = Precluded; NA = Not Analyzed; low intensity impact
${ }^{7}$ Contribution of the Project = Indicates if impacts are caused by the proposed facility (PE: Project Effects), or the combined influence of the Project and other past or present actions (CE = Combined Effects)
${ }^{8} S=$ Screened; Impacts are considered Less than Significant based on screening criteria applied to the analysis.

## New Exhibit R Section

## Section 3.3.2.10 Oregon Scenic Byways <br> Description of Additional Information: New Exhibit R section describing Hells Canyon and Grande Tour Route Scenic Byways.

## Text Edits Shown in Red

## Hells Canyon Scenic Byway All-American Road

The Hells Canyon Scenic Byway (Map ID: Hells Canyon Scenic Byway) is designated as an AllAmerican Road (Hells Canyon Scenic Byway Committee 2004). The byway route includes portions of OR 82, OR 86, and OR 350, and Forest Road 39 in Union, Wallowa, and Baker counties. The Proposed Route crosses the Hells Canyon Scenic Byway on OR 86 just west of Baker City. OR 86 is used as a primary travel corridor between Baker City and the towns of Richland and Keating. This road is also used by people touring on the scenic byway. This stretch of the highway experiences average daily traffic volume of approximately 930 vehicles (ODOT 2012).

Relevant Land Use Plan Designation. The Hells Canyon Scenic Byway (Map ID: Hells Canyon Scenic Byway) is a designated as an All-American Road (Hells Canyon Scenic Byway Committee 2004). The purpose of the National Scenic Byway System is to showcase outstanding scenery and to stimulate local economies with tourism. This byway route has been used for decades by residents and for destination-oriented visitors.

Existing Conditions. The portion of the Hells Canyon Scenic Byway in proximity to the Proposed Route traverses through high desert with flat to rolling terrain characterized by curved, undulating topography. When traveling eastbound on OR 86, the incline of the roadway as it leaves Baker Valley similarly acts as a "gateway," providing roadway travelers the experience of leaving the more developed landscape as they travel toward the more naturally appearing landscape. When traveling westbound, viewer experience is similar in that roadway travelers descend from the high desert into the more developed areas of Baker Valley at the western most terminus of OR 86. The Blue Mountains to the west and Wallowa Mountains to the east provide distance enclosure to this view. Overall, the landscape surrounding the portion of the Hells Canyon Scenic Byway in proximity to the Proposed Route is natural appearing, as development is limited. An existing 230-kV transmission line crosses OR 86 and is visible to the north. Scenic quality of the portion of the Hells Canyon Scenic Byway in proximity to the Proposed Route is considered low (Class C).

Viewer Groups and Characteristics. Viewer groups include roadway travelers commuting between Baker City and the towns of Richland and Keating or touring on the scenic byway. Viewers are characterized as transient, with exposure to the surrounding landscape experienced in motion.

Project Location. The Proposed Route crosses OR 86 less than 1 mile east of the western end of the scenic segment, between highway MP 5 and MP 6, near the western terminus of the byway at the entrance to the Baker Valley (Attachment R-3, Figure R-3-3).

OR 86 is located outside of the 10-mile viewshed buffer of the cleared ROW for the Morgan Lake Alternative, and therefore impacts from this alternative are not discussed any further in this document. West of Bombing Range Road Alternative 1, West of Bombing Range Road

Alternative 2, and the Double Mountain Alternative are located greater than 5 miles from this site and therefore are also not considered in this visual impact analysis. Likewise, because these Alternative Routes are not forested, they are not analyzed for potential visual impacts resulting from a cleared ROW. The analysis below pertains to the Proposed Route.

Mitigation Considered. In evaluating various alternatives for Project siting, IPC concluded that potentially significant visual impacts could result from facility structures in the vicinity of the NHOTIC. To address potential impacts, IPC analyzed three design options aimed at reducing impact to less than significant: (1 applying a natina finish to the lattice structure; (2 using an Hframe structure with galvanized finish; or (3 using an H-frame structure with a natina finish. IPC incorporated Option 3 into its revised Project design as planning for the final indicative design for the Project. This design consideration is relevant to OR 86 as the transmission structures considered are those that are visible from OR 86.

The final indicative design moved the Proposed Route to the east, outside of the active agricultural areas based on comments from the local government. To mitigate for potential visual impacts from this route to the NHOTIC ACEC, VRM II area, and NHOTIC recreation area, IPC proposes using low stature (100-129 feet) H-Frame structures. Because these transmission structures are visible from OR 86, this mitigation is considered in the impact assessment for OR 86 .

The Hells Canyon Scenic Byway is located outside of the 10-mile viewshed buffer of the cleared ROW of both the Proposed Route and the Morgan Lake Alternative, and therefore impacts from this Project feature are not discussed any further in this document. West of Bombing Range Road Alternative 1, West of Bombing Range Road Alternative 2, and the Double Mountain Alternative are located greater than 5 miles from the Hells Canyon Scenic Byway and are therefore also not considered in this visual impact analysis. Likewise, because these Alternative Routes are not forested, they are not analyzed for potential visual impacts resulting from a cleared ROW.

The analysis presented below pertains to the Proposed Route.

## Visual Impact Assessment

Temporary and Short-term Impacts: Construction-related actions will be visible to the north, including pulling and tensioning sites and construction of new primitive roads and a small ( $<0.05$ mile) segment of new, bladed road located to the south. Construction-related actions will be of high magnitude, resulting from the strong visual contrast in line and texture of these features and close proximity in which they are viewed. Viewers on OR 86 will experience constructionrelated impacts episodically as they pass through this localized impact area. Impacts will be temporary to short-term, lasting for the duration of construction and rehabilitation of the site (approximately 7 years for grassland and agriculture). Because short-term impacts are not considered significant, construction-related actions are not considered further in this analysis. Long-term Impacts:

- Duration: Impacts will be primarily associated with the transmission towers, and therefore will be long-term, extending for the life of the Project.
- Magnitude: The proposed 500-kV towers will appear large in scale and co-dominant within the landscape, including existing $230-\mathrm{kV} \mathrm{H}$-frame transmission structures when viewed at close distances, thereby introducing moderate visual contrast. Impact magnitude will be medium.
- Viewer Perception: This medium magnitude impact will be visible for approximately 1 mile when traveling in either direction on the highway. Views of the Project will be experienced from a neutral or elevated vantage point and are episodic (experienced for less than 1 minute while traveling a speed of 45 miles per hour), thereby resulting in low viewer perception.
- Resource Change: Medium magnitude impacts will be manifest at the western terminus of the scenic segment, thereby aligning with the transition, or "gateway," rather than fragmenting or bisecting the resource at its center. The Project will appear dominant and will lower the scenic quality component score for cultural modification. The Project will extend the cultural character of the landscape for 0.75 mile when heading eastbound. When heading westbound, travelers descending into Baker Valley will already be experiencing the more cultural/agricultural landscape character of the Baker Valley, therefore no change in the overall existing character is expected. Overall scenic quality will remain low (Class C), and the resource change will be medium.


## Significance Determination.

- Impact Intensity: Impact intensity will be medium due to low viewer perception and medium resource change.
- Context: To date, no policies or ordinance provisions have been established by Baker County. Because no management direction has been established for this scenic resource, IPC has found the Project will not preclude the resource from providing the scenic value for which it is recognized. Additionally, the impact will be localized rather than regional in scale. Medium intensity impacts are consistent with this planning goal.
- Degree to which the possible impacts are caused by the proposed action: Medium intensity impacts disclosed in this assessment are caused by the proposed facility and are not the result of other past or present actions.
- Conclusion: Visual impacts to the Hells Canyon Scenic Byway will be of medium intensity and less than significant.


## Grand Tour Route

The Grande Tour Route (Map ID Grande Tour Route) is designated as an Oregon Tour Route (The Grande Tour Route Committee, 1998) is an 80-mile loop route east and southeast of La Grande through parts of Union and Baker Counties. The route includes parts of OR 82, OR 203, and OR 237 and passes through the towns of La Grande, Cove, Medical Springs, and Union. The Proposed Route passes within 0.2 miles of the western most portion of the Grand Tour Route along Foothills Road near Ladd Marsh WMA in Union County. Foothills Road is used by local residents as a travel route to and from the city of La Grande. This road is also used by people touring on the scenic byway and for access to the Ladd Marsh WMA. There is no traffic volume data available for Foothills Road.

Relevant Land Use Plan Designation. The Grande Tour Route is designated as an Oregon Tour Route (The Grande Tour Route Committee, 1998). The purpose of this Oregon Tour Route is to is to showcase outstanding scenery and to strengthen local economies, build a bridge between urban and rural residents, preserve and maintain the area's history, and to provide opportunities for education.

Existing Conditions. The portion of the Grande Tour Route in proximity to the Proposed Route traverses rural farm steads, the marsh lands of the Ladd Marsh WMA, and the brush and forested slopes of Glass Hill Ridge. When traveling west on Foothill Road away from I-84 the mostly rural landscape gives roadway travelers the experience of leaving the more developed
landscape as they travel toward the more naturally appearing landscape. The Blue Mountains to the west provide distance enclosure to this view. When traveling south from La Grande on Foothill Road, roadway travelers will similarly have the experience of leaving the more developed landscape as they travel toward the more naturally appearing landscape. The Ladd Marsh WMA with its open water areas and stands of willow and cottonwood trees dominates the view to the north and east of Foothill Road. I-84 crosses the eastern edge of the Ladd Marsh WMA creating a sharp, horizontal line across the landscape. A viewpoint accessed off Foothill Road is located at the northwest corner of Ladd Marsh providing a view over the marsh to the south and east. Overall, the landscape surrounding the portion of the Grande Tour Route in proximity to the Proposed Route is natural appearing, as landscape development is limited. An existing $230-\mathrm{kV}$ transmission line crosses along the base of the hills just west of Foothill Road and then climbs the brush and forested slope of Glass Hill Ridge. An existing buried gas pipeline also descends the hillside from the northwest and crosses Foothill Road near the northwest corner of Ladd Marsh WMA.

Viewer Groups and Characteristics. Viewer groups include roadway travelers commuting between rural Union County areas and La Grande or touring on the scenic byway. Viewers on Foothill Road are characterized as transient, with exposure to the surrounding landscape experienced in motion. Viewers who stop at the Ladd Marsh WMA viewpoint are characterized as stationary, with time to experience the surrounding landscape.

Project Location. The Proposed Route passes within 0.2 miles of the western most portion of the Grande Tour Route along Foothills Road near Ladd Marsh WMA about 5 miles south of La Grande in Union County (Attachment R-3, Figure R-3-3).

The portion of the Grande Tour Route along Foothill Road is located inside (1.8 miles distant) of the 10-mile viewshed buffer of the cleared ROW for the Morgan Lake Alternative. Viewshed analysis indicates that the Morgan Lake Route will not be visible from any portion of the byway (Attachment R-6). Because the Morgan Lake Route is not visible from the Grande Tour Route along Foothill Road it is not assessed in the Exhibit $R$ analysis.

The West of Bombing Range Road Alternative 1, West of Bombing Range Road Alternative 2, and the Double Mountain Alternative are located greater than 5 miles from this site and are therefore also not considered in this visual impact analysis. Likewise, because these Alternative Routes are not forested, they are not analyzed for potential visual impacts resulting from a cleared ROW. The analysis below pertains to the Proposed Route.

Mitigation Considered. Oregon Department of Transportation recommended that to reduce impacts to scenic qualities, the structures should be replaced in kind or with a structure size and color that responds to the surrounding environment. Lattice towers that are backdropped by vegetation could be stained with a Natina finish. The Natina finish can assist in making the towers less visible against the backdrop.

## Visual Impact Assessment

Temporary and Short-term Impacts: Construction-related actions will be visible to the west, including pulling and tensioning sites and construction of new bladed road spurs. Constructionrelated actions will be of high magnitude, resulting from the strong visual contrast in line and texture of these features and close proximity in which they are viewed. Viewers on Foothill Road will experience construction-related impacts continuously as they pass through this localized impact area. Impacts will be temporary to short-term, lasting for the duration of construction and
rehabilitation of the site. Because short-term impacts are not considered significant, construction-related actions are not considered further in this analysis.
Long-term Impacts:

- Duration: Impacts will be primarily associated with the transmission towers, and therefore will be long-term, extending for the life of the Project.
- Magnitude: The proposed 500-kV towers will appear large in scale and co-dominant within the landscape, including existing 230-kV H-frame transmission structures when viewed at close distances, thereby introducing moderate visual contrast. Impact magnitude will be medium.
- Viewer Perception: This medium magnitude impact will be visible for approximately three miles when traveling northbound on Foothill Road, and for approximately two miles when traveling southbound. Views of the Project will be from a neutral or low vantage point and are continuous, thereby resulting in low to medium viewer perception.
- Resource Change: Medium magnitude impacts will be manifest along the Foothill Road portion of the Grande Tour Route. The Proposed route will not fragment or bisect the resource but will pass adjacent to it. The project will appear dominant and will lower the scenic quality component score for cultural modification. The Project will extend the cultural character of the landscape for approximately three miles when traveling northbound on Foothill Road, and for approximately two miles when traveling southbound. Overall scenic quality will remain low (Class C), and the resource change will be medium.


## Significance Determination

- Impact Intensity: Impact intensity will be medium due to low viewer perception and medium resource change.
- Context: IPC has found the Project will not preclude the resource from providing the scenic value for which it is recognized. Additionally, the impact will be localized rather than regional in scale. Medium intensity impacts are consistent with the Grande Tour Route Management Plan (1998).
- Degree to which the possible impacts are caused by the project: Medium intensity impacts disclosed in this assessment are caused by the proposed facility and the result of other past or present actions including the existing $230-\mathrm{kV}$ transmission line and I-84.
- Conclusion: Visual impacts to the Grande Tour Route will be of medium intensity and less than significant.


## Section 3.3.3.2, Page R-118

Description of Additional Information: New information describing mitigation for the Ladd Marsh portion of the Grande Tour Route Scenic Byway.

## Text Edits Shown in Red

As discussed above, in the absence of mitigation, the Project may cause significant adverse impacts to three important scenic resources within the analysis area: the Ladd Marsh Portion of the Grande Tour Route, Oregon Trail ACEC - NHOTIC Parcel and the Birch Creek ACEC. Based on this conclusion, IPC developed site specific measures to avoid, reduce, or otherwise mitigate these potentially significant impacts so that the Project can ultimately be constructed, operated, and maintained without a significant adverse impact.

## Ladd Marsh Portion of the Grande Tour Route

If the Proposed Route is constructed, lattice towers that are backdropped by vegetation in the vicinity of Ladd Marsh and Foothill Road will be stained with a Natina finish. The Natina finish can assist in making the towers less visible against the backdropped vegetation. If the Morgan Lake Route is constructed no mitigation will be required as this route will not be visible from the resource.

Section 4.0, Page R-123.
Description of Additional Information: New Proposed Site Certificate Condition, Scenic Resource Condition 4.

Text Edits Shown in Red
Scenic Resources Condition 4: During construction, to address potentially significant adverse impacts to the scenic resources at the Ladd Marsh portion of the Grande Tour Route, if the Proposed Route is constructed the certificate holder shall construct the facility using tower structures meeting the following criteria between approximately Milepost 108 and Milepost 113:
a. Lattice-frames; and
b. Frames will be stained with Natina finish.

## Attachment R-3, New Section on Oregon Scenic Byways

Page R-3-23

## Description of Additional Information:

New Section 3.0A added to direct readers to Section 3.0 Oregon Route 86 for discussion on impacts to the Hells Canyon Scenic Byway.

## Text Edits Shown in Red

Section 3.0A Hells Canyon Scenic Byway All-American Road. Please see section 3.0 Oregon Route 86 (MP4.81 TO MP 40.64). Attachment R-3, Page R-3-16. This section of OR 86 is the same route as the Hells Canyon Scenic Byway. Project impacts occur at the same location and are identical for both scenic resources. Proposed mitigation will reduce impacts to less than significant for both resources.

## Section 3.0B Grande Tour Route

## Description of Additional Information:

New Section 3.0B added to for discussion on impacts to the Grande Tour Route.
Text Edits Shown in Red
3.0B The Grande tour route Oregon tour route (Ladd marsh area)

Resource: The Grande Tour Route Oregon Tour Route (Ladd Marsh Area)
Relevant Exhibit: R
Exhibit R Map ID: The Grande Tour Route
Relevant Plan: The Grande Tour Management Plan (1998),
Resource Type: Linear Corridor
Relevant KOP(s): 4-16, 4-26

## PART 1: Establish Baseline Conditions

Designation: Per the Grande Tour Route Management Plan (1998):
"The Scenic qualities of the Grande Tour are of statewide significance. The view from the overlook above Ladd March Wildlife Area is exceptional, taking in the shimmering waters and green foliage of the marsh, against a backdrop of farmland, forested hills and snow-tipped peaks of the Wallowa Mountains".

Interpretation of Designation: The Grande Tour Route is a designated Oregon Tour Route by the Oregon Department of Transportation. It is included in the Oregon Scenic Byways Official Driving Guide (traveloregon.com/byways).

Resource Overview: The Grande Tour Route is designated an Oregon Tour Route representing scenic views and sites considered of statewide importance (Grande Tour Route Management Plan 1998). The Grande Tour Management Plan identifies four areas of scenic quality; Ladd Marsh Wildlife Management Area (WMA), Thief Valley Reservoir, Catherine Creek

Summit, and the Ascension Chapel in the town of Cove. The Project is not visible form Catherine Creek Summit and the Ascension Chapel in the town of Cove is outside the analysis area.

The Grande Tour Route is an 80-mile loop route east and southeast of La Grande through parts of Union and Baker Counties. The route includes parts of OR 82, 203, and 237 and passes through the towns of La Grande, Cove, Medical Springs, and Union. The tour route overlaps with a part of the Hells Canyon Scenic Byway east of La Grande. Most of the tour route is within the 10-mile analysis area.

The management plan for the Grande Tour Route identifies four goals for the route: 1) strengthen local economies; 2) build a bridge between urban and rural residents; 3) preserve and maintain the area's history; and 4) provide opportunities for education. The tour route management plan includes discussion of the general landscape and scenic qualities within the route region and identifies four specific locations of scenic quality. The four areas of scenic quality identified include Ladd Marsh Wildlife Management Area (WMA), Thief Valley Reservoir, Catherine Creek Summit, and the Ascension Chapel in the town of Cove.

The Ascension Chapel in the town of Cove is outside the analysis area. Catherine Creek Summit is about 7.8 miles from the Project and viewshed analysis indicates that the Project would not be visible from this portion of the tour route (Attachment R-6).

The Grande Tour Route is an 80-mile loop route east and southeast of La Grande through parts of Union and Baker Counties. The route includes parts of OR 82, OR 203, and OR 237 and passes through the towns of La Grande, Cove, Medical Springs, and Union. The tour route overlaps with a part of the Hells Canyon Scenic Byway east of La Grande. Most of the tour route is within the 10-mile analysis area.

The management plan for the Grande Tour Route identifies four goals for the route which include: 1)strengthen local economies; 2) build a bridge between urban and rural residents; 3) preserve and maintain the area's history; and 4) provide opportunities for education. The tour route management plan includes discussion of the general landscape and scenic qualities within the route region and identifies four specific locations of scenic quality.

Per OAR 345-022-0080, The Grande Tour Route is being evaluated as a Scenic Resource.
The Grande Tour Route is not considered a Protected Area and not evaluated per OAR 345-022-0040.

The Grande Tour Route is not considered an important Recreation Resource, and not evaluated per OAR 345-022-0100.

Existing Conditions: The portion of the Grande Tour Route in proximity to the Proposed Route traverses rural farm steads, the marsh lands of the Ladd Marsh WMA, and the brush and forested slopes of Glass Hill Ridge. When traveling west on Foothill Road away from I-84 the mostly rural landscape gives roadway travelers the experience of leaving the more developed landscape as they travel toward the more naturally appearing landscape. The Blue Mountains to the west provide distance enclosure to this view. When traveling south from La Grande on Foothill Road roadway travelers will similarly have the experience of leaving the more developed landscape as they travel toward the more naturally appearing landscape. The Ladd Marsh WMA with its open water areas and stands of willow and cottonwood trees dominates the view to the north and east of Foothill Road. I-84 crosses the eastern edge of the Ladd Marsh WMA creating a sharp, horizontal line across the landscape. A viewpoint accessed off Foothill Road is located at the northwest corner of Ladd Marsh providing a view over the marsh to the
south and east. Overall, the landscape surrounding the portion of the Grande Tour Route in proximity to the Proposed Route is natural appearing, as landscape development is limited. An existing $230-\mathrm{kV}$ transmission line crosses along the base of the hills just west of Foothill Road and then climbs the brush and forested slope of Glass Hill Ridge. An existing buried gas pipeline also descends the hillside from the northwest and crosses Foothill Road near the northwest corner of Ladd Marsh WMA.

Overall, the landscape surrounding Ladd Marsh is natural appearing, as landscape development is limited along Foothill Road for the majority of its length. There is an existing $230-\mathrm{kV}$ transmission line and I-84 that add a level of existing disturbance to the area. Because of its non-forested setting, this resource was evaluated using methods adapted from the BLM Visual Resource Management (VRM) system. Per BLM's visual resource inventory methods described in manual H-8410-1 (BLM 1986), the scenic quality of the existing landscape for the Ladd Marsh portion of the scenic corridor is considered low (class C).

| Oregon Route 86 Scenic Quality Rating: Pre-project |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Landform (1 to 5) | Vegetation (0 to 5) | Water (0 to 5) | $\begin{gathered} \text { Color } \\ (1 \text { to } 5) \end{gathered}$ | Adjacent Scenery (0 to 5) | Scarcity (1 to $5+$ ) | Cultural Modification (-4 to 2) | Total Score |
| 2 | 2 | 0 | 2 | 3 | 2 | 0 | 11 (C) |

Viewer Groups: Viewers will be transient and include motorists using Foothill Road as a primary travel corridor to La Grande as well as people touring on the scenic byway.

## PART 2: Impact Likelihood and Magnitude Assessment Alternatives Not Evaluated

Ladd Marsh is located inside of the 10 -mile viewshed buffer of the cleared ROW for the Morgan Lake Alternative. However, the Morgan Lake Alternative is not visible from Ladd Marsh and therefore impacts from this alternative are not discussed any further in this document. West of Bombing Range Road Alternative 1, West of Bombing Range Road Alternative 2, and the Double Mountain Alternative are located greater than 5 miles from this site and therefore are also not considered in this visual impact analysis. Likewise, because these Alternative Routes are not forested, they are not analyzed for potential visual impacts resulting from a cleared ROW. The analysis below pertains to the Proposed Route.

## Proposed Route

This analysis assumes towers in the vicinity of Ladd Marsh will be lattice-frame structures stained with a Natina finish. The 500-kV towers will appear large in scale when viewed at close distances, introducing strong visual contrast. The structures will appear larger in scale, to the existing 230-kV H-frame structures visible in the foreground.

The proposed lattice structures and the existing $230-\mathrm{kV}$ will be visible for approximately three miles when traveling northbound on Foothill Road, and for approximately two miles when traveling southbound. The proposed lattice structures will be approximately 60-70 feet taller than the existing 230-kV H-frame structures. Views of the Project will be experienced from a neutral or lower vantage point and be episodic (experienced for less than 5 minutes while traveling a speed of 45 miles per hour). Therefore, although the Project will appear dominant and will lower the scenic quality component score for cultural modification, it will retain its cultural appearance in this portion of the resource. Scenic quality will remain low (class C ).

| Oregon Route 86 Scenic Quality Rating: Post-project |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Landform (1 to 5) | Vegetation (0 to 5) | Water (0 to 5) | Color <br> (1 to 5) | Adjacent Scenery (0 to 5) | Scarcity <br> (1 to 5+) | Cultural Modification (-4 to 2) | Total Score |
| 2 | 2 | 0 | 2 | 3 | 2 | -1 | 10 (C) |

## Likelihood of Impact

IPC considered all identified impacts to be "likely" to occur.
Magnitude of Impact - Impact Duration

| Indicator | Criteria used to Determine Impact Duration |  |  |
| :--- | :--- | :--- | :--- |
|  | $\begin{array}{l}\text { Temporary. } \\ \text { Impacts would last } \\ \text { for up to 3 years } \\ \text { (construction } \\ \text { periods only and } \\ \text { recovery and } \\ \text { revegetation of } \\ \text { temporary impacts } \\ \text { in agricultural } \\ \text { areas). }\end{array}$ | $\begin{array}{l}\text { Short-term. Impacts would } \\ 3 \text { to10 years (recovery and } \\ \text { revegetation of temporary } \\ \text { impacts in grasslands and } \\ \text { herbaceous wetlands). }\end{array}$ | $\begin{array}{l}\text { Long-term. Impacts } \\ \text { would extend for } \\ \text { greater than 10 } \\ \text { years, or for the life } \\ \text { of the Project } \\ \text { (permanent Project }\end{array}$ |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |$]$ lands).

Explanation: Impacts will be primarily associated with the transmission line, and therefore will be long-term, extending for the life of the Project.

## Magnitude of Impact - Visual Contrast and Scale Dominance

| Indicator | Criteria used to Determine Visual Contrast and Scale Dominance |  |  |
| :---: | :---: | :---: | :---: |
| Visual Contrast and Scale Dominance | Low. Project components result in weak to no visual contrast against the existing landscape, and project-related impacts are subordinate. | Medium. Project components result in moderate visual contrast against the existing landscape, and project-related impacts are co-dominant. | High. Project components result in strong visual contrast against the existing landscape, and projectrelated impacts are dominant. |
| Explanation: Project components will result in moderate visual contrast against the existing landscape and in close proximity such that they will appear co-dominant against the existing landscape, including existing 230-kV H-Frame transmission structures. Therefore, impact magnitude will be medium. |  |  |  |

## Magnitude of Impact - Resource Change and Viewer Perception

| Indicator | Criteria used to Determine Resource Change |  |  |
| :---: | :---: | :---: | :---: |
| Resource Change | Low. The geographic extent of medium to high magnitude impacts is limited to a discrete portion of the resource such that scenic quality or attractiveness, and character of the resource will not change. | Medium. The geographic extent of medium to high magnitude impacts will lower the value of one or more key factor used to rank scenic quality or attractiveness; however, it will not reduce the scenic quality or scenic attractiveness class or change the overall landscape character of the resource. | High. The geographic extent of medium to high magnitude impacts will lower the scenic quality or attractiveness class and will alter landscape character of the resource. |
| Explanation: The structures will be visible for approximately three miles when traveling northbound on Foothill Road, and for approximately two miles when traveling southbound. Therefore, although the Project will appear dominant and will lower the scenic quality component score for cultural modification, it will retain its cultural appearance in this portion of the resource. Scenic quality will remain low (class C). Therefore, the resource change will be medium. |  |  |  |
| Viewer Perception | Low. Views of the Project are experienced from a neutral or lower vantage point, and are predominantly peripheral, intermittent, or episodic; OR, the Project is located primarily in the background distance zone ( $5-15$ miles). | Medium. Views of the Project are experienced from a neutral or inferior vantage point, and are equally headon and peripheral, equally continuous and intermittent; OR, the Project is located primarily in the foreground/ middleground distance zone (0.5-5 miles). | High. Views of the Project are experienced from a neutral or inferior vantage point, and are predominantly headon, predominantly continuous; OR, the Project is located primarily in the immediate foreground distance zone (up to 0.5 miles). |
| Explanation: Views of the Project will be episodic and experienced from a neutral or lower vantage point. Viewer perception will be low. |  |  |  |

## PART 3: Consideration of Intensity, Causation, and Context

## Impact Intensity

| Intensity Rating |  |  |  |
| :--- | :--- | :--- | :--- |
| Viewer Perception | Resource Change |  |  |
|  | LOW | MEDIUM | HIGH |
| LOW | Low | Medium | High |
| MEDIUM | Low | Medium | High |
| HIGH | Low | High | High |

The Project will have medium magnitude impacts as travelers will parallel to the Proposed Route and have close up views of the $500-\mathrm{kV}$ structures that will introduce strong visual contrast and appear dominant. The structures will be visible for approximately three miles when traveling northbound on Foothill Road, and for approximately two miles when traveling southbound. The cultural modification component score of scenic quality will be reduced; however, the landscape character and scenic quality will be maintained such that resource change will be medium. Views of the Project will be episodic and experienced from a neutral or lower vantage point; therefore, viewer perception will be low. Therefore, visual impacts will be of medium intensity.

## Degree to Which Impacts are Caused by the Project

The scenic quality of the resource under operational conditions is the result of the combined influence of the Project and other past or present actions, such as the existing $230-\mathrm{kV}$, I-84 and the agricultural, and residential, uses in the area. Collectively, the existing $230-\mathrm{kV}$ and the Proposed Project will result in medium intensity impacts.

Context

| Indicator | Context Criteria |
| :--- | :--- |
| Scenery as a <br> Valued Attribute | Scenery is a valued attribute of the resource, either as a perceived <br> amenity (i.e., recreation setting) or as defined in OAR 345-022-0080; or, <br> Scenery is not a valued attribute of the resource. |
| Explanation: The Grande Tour Route Management Plan (1998) identifies the Ladd Marsh <br> portion of the route as an important scenic resource per OAR 345-022-0080. |  |
| Persistence of <br> Scenic Value | Persistence of Scenic Value is either: <br> Not-Precluded. Impacts will not preclude the ability of the resource to <br> provide the scenic value for which it was designated or recognized in the <br> applicable land management plan; or, <br> Precluded. Impacts will preclude the ability of the resource to provide the <br> scenic value for which it was designated or recognized in the applicable <br> land management plan. |
| Explanation: <br> The Grande Tour Management Plan (1998) identifies the scenic qualities are of statewide <br> importance. Because IPC's impacts are localized, and viewer perception was identified as low; <br> IPC has not found the Project to preclude the Grande Tour Route from providing the scenic <br> value for which it is recognized. <br> No specific scenic management direction has been established for this scenic resource; <br> therefore, IPC's impacts are not inconsistent with management direction provided. |  |


| Significance Criteria |  |  |
| :--- | :--- | :--- |
|  | Scenery as a Valued Attribute | Persistence of Scenic Value |
| Less than Significant | Yes or No | Not Precluded |
| Potentially Significant | Yes | Precluded |

## Summary and Conclusion

Visual impacts to the Ladd Marsh portion of the Grande Tour Route will be of medium intensity, resulting from low viewer perception and medium resource change. Impacts will result from the combined influence of the Project and other past or present actions, notably the existing and $230-\mathrm{kV}$ transmission line and I-84. Since no specific management direction has been established for this scenic resource, and the impacts are localized, IPC has not found the Project to preclude the resource from providing the scenic value for which it is recognized. Visual impacts to the Ladd Marsh portion of the Grande Tour Route and the Grande Tour Route in its entirety are less than significant.


Figure R-3-3B. Grande Tour Route, Ladd Marsh Vicinity.













