Exhibit R

Scenic Resources

Bakeoven Solar Project November 2019

Prepared for



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Acronyms and Abbreviations

Applicant Bakeoven Solar, LLC

BLM Bureau of Land Management

BPA Bonneville Power Administration

Comp Plan Comprehensive Plan

Facility Bakeoven Solar Project

I-84 Interstate Highway 84

kV kilovolt

Maupin Substation Bonneville Power Administration Maupin Interconnection

Substation

MHNF Mount Hood National Forest

MP milepost

NSA National Scenic Area

0&M operations and maintenance

OAR Oregon Administrative Rule

ODOT Oregon Department of Transportation

OR Oregon Highway

RMP Resource Management Plan

ROD Record of Decision

UGB Urban Growth Boundary

U.S. Highway

U.S. Department of Agriculture, Forest Service

ZVI zone of visual influence



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1.0 Introduction

Bakeoven Solar, LLC (Applicant) proposes to construct and operate a solar energy generation facility and related or supporting facilities in Wasco County, Oregon. This Exhibit R was prepared to meet the submittal requirements in Oregon Administrative Rule (OAR) 345-021-0010(1)(r).

2.0 Analysis Area

The analysis area for scenic resources is the area within the proposed site boundary plus the area within 10 miles from the site boundary (Figure R-1). The site boundary is defined in Exhibits B and C, which includes the information required by OAR 345-021-0010(1)(b) and (c).

3.0 Identification of Significant or Important Scenic Resources

OAR 345-021-0010(1)(r) An analysis of significant potential impacts of the proposed facility, if any, on scenic resources 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, providing evidence to support a finding by the Council as required by OAR 345-022-0080, including:

- (A) A list of the local, tribal and federal plans that address lands within the analysis area.
- (B) Identification and description of the scenic resources identified as significant or important in the plans listed in (A), including a copy of the portion of the management plan that identifies the resource as significant or important.
- (E) A map or maps showing the location of the scenic resources described under (B).

This section documents the inventory of scenic resources identified as significant or important in local, tribal, and federal land use plans within the analysis area, as required to demonstrate compliance with the approval standard in OAR 345-022-0080. The analysis area includes two Oregon counties, two Oregon municipalities, and federal land administered by the Bureau of Land Management (BLM).

Based on a review of applicable land management plans, the Applicant concludes that significant or important scenic resources are identified by multiple plans within the analysis area. The following sections describe the applicable jurisdictions, their applicable land use plans, and the determination as to whether scenic resources in the analysis area are designated as significant or important by those jurisdictions. These descriptions are summarized in Table R-1 and the locations of scenic resources are shown on Figure R-1.

Table R-1. Inventory of Scenic Resources

Jurisdiction	Plan	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resources Identified in Analysis Area (Y/N)	Name of Scenic Resource in Analysis Area	Plan Reference	
		COUN	TIES			
Wasco County	Wasco County Comprehensive Plan 1983, as updated through 2010	Yes	Yes	Deschutes River Canyon White River Canyon US 97 US 197 OR 216 OR 218	Parks and Recreation and Scenic Areas, Chapter 5, Section J, pages 5-15 to 5-20	
Sherman County	Comprehensive Land Use Plan Sherman County Oregon 1994, as updated through 2007	Yes	Yes	Deschutes River Canyon US 97 OR 216	Physical Characteristics, Section XI, pages 16 - 18	
	MUNICIPALITIES					
City of Maupin	Comprehensive Land Use Plan Update (2005)	No	No	N/A	Background Information, page 8	
City of Shaniko	Shaniko Comprehensive Land Use Plan (1978)	No	No	N/A	Section IV Physical Characteristics, page 27	
TRIBES						
None within Analysis Area	N/A	N/A	N/A	N/A	N/A	

Jurisdiction	Plan	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resources Identified in Analysis Area (Y/N)	Name of Scenic Resource in Analysis Area	Plan Reference
		FEDE	RAL		
BLM, Prineville District	Two Rivers Resource Management Plan Record of Decision (BLM 1986)	Yes	Yes	Deschutes River Canyon	Chapter 2, Two Rivers Resource Management Plan Decisions/Special Management Areas; Map 6, Areas of High Visual Quality and Map 9, Special Management Areas
	Lower Deschutes River Management Plan Record of Decision (BLM 1993)	No	No	N/A	N/A
White River National Wild and Scenic River Management Plan USFS Decision Notice and Finding of No Significant Impact (USFS 1994)		Yes	No	N/A	Chapter 2 Outstandingly Remarkable Values and Desired Future Condition, pages 8-9

3.1 Counties

3.1.1 Wasco County

Chapter 5, Section J.1 of the Wasco County (2010) Comprehensive Plan (Comp Plan) identifies segments of eight highways in Wasco County as designated scenic areas. The Comp Plan describes scenic highways as "those adjacent to or passing through scenic areas in State or Federal parks, historic sites, or any area of natural beauty that has been designated a scenic area by the Scenic Area Board." The designated scenic highways consist of segments of Interstate Highway 84 (I-84), U.S. Highway (US) 97, US 97/197, US 197, US 26, US 30, Oregon Highway (OR) 216, and OR 218. The identified segments of I-84, US 30, and US 26 are located outside of the analysis area and are therefore not carried forward for this assessment. Portions of the designated scenic segments on highways US 97, US 197, OR 216, and OR 218 are within the analysis area; these highway segments are identified in Table R-1, and potential impacts on these scenic resources are addressed in Section 4 below.

Chapter 5, Section J.3 of the Comp Plan identifies six outstanding scenic and recreational areas in Wasco County. These features include three scenic rivers: the Deschutes, John Day, and White rivers. The Comp Plan also identifies the Columbia River Gorge National Scenic Area (NSA), lands around Rock Creek Reservoir, and lands around Pine Hollow Lake as outstanding scenic and recreation areas. The John Day River, Columbia River Gorge NSA, Rock Creek Reservoir, and Pine Hollow Lake are located outside of the analysis area and are therefore not carried forward for this assessment. Portions of the designated Deschutes River and White River scenic waterways are within the analysis area; these important scenic resources are identified in Table R-1 and potential Facility impacts on these scenic resources are addressed in Section 4 below.

3.1.2 Sherman County

The Sherman County Comprehensive Land Use Plan (2007) addresses scenic resources or sites in Finding XI of Section XI, Physical Characteristics. The finding states that "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 (ODOT) has designated certain segments of I-84, U.S. 97, ORE 206 and ORE 216 as Scenic Highways." Elsewhere the Comprehensive Land Use Plan acknowledges the designation of "lands within one-quarter mile of the Deschutes and John Day Rivers bordering Sherman County to be within the Oregon State Scenic Waterway System" (Oregon Revised Statutes 390.805 through 390.925).

The John Day River in Sherman County is located outside of the analysis area and is therefore not carried forward for this assessment. A segment of the Deschutes River in Sherman County is within the analysis area, and therefore is included in Table R-1 and is addressed in Section 4. A segment of US 97 south of Grass Valley and the designated scenic segment of OR 216 are within the analysis area and are also addressed in Table R-1 and Section 4. The Comprehensive Land Use Plan does not

provide any more specific reference to locations of rock outcroppings and trees that are considered important scenic resources; therefore, no such features are identified in Table R-1.

3.2 Municipalities

3.2.1 City of Maupin

Maupin is an incorporated community of approximately 425 residents (Oregon Secretary of State 2018) located on US 197 and the Deschutes River in northcentral Wasco County. The updated City of Maupin (2004) Comprehensive Land Use Plan (updated Comp Plan) addresses scenic resources in the Background Information - Natural Resources, Scenic and Historic Areas, and Open Space section of the Plan. The updated plan notes that the original Comp Plan developed in the late 1970s addressed Goal 5 resources in various places and states "No significant resources were noted." This section of the updated plan references the federal Wild and Scenic River and State Scenic Waterway designations for the Deschutes River and notes that the area within the city limits at the time of these designations was excluded from both designations. The updated Comp Plan goes on to note (page 10) that "the City maintains setback requirements in the Urban Growth Boundary (UGB) to protect the Oregon State Scenic River Designation of the Deschutes River." A subsequent discussion under the Urbanization heading references a Scenic Waterway District overlay zone that was established in the Maupin Comp Plan to guide development in the south end of the UGB, such that it is not readily visible from the river. The Deschutes River is addressed in this exhibit as an important scenic resource, based on language in county (Wasco and Sherman) and federal land use plans.

3.2.2 City of Shaniko

Shaniko is an incorporated community of approximately 35 residents (Oregon Secretary of State 2018) located on US 97 in southeastern Wasco County. The City of Shaniko (1978) Comprehensive Land Use Plan does not include a specific section that addresses natural resources or scenic areas within the city's jurisdictional boundary. The Introduction includes a statement that those living in Shaniko enjoy scenery. Section VI. Community Facilities and Services includes a discussion of recreational facilities that references the scenic waterway designations for the Deschutes and John Day rivers and the ODOT identification of highway segments in the region as scenic areas (as discussed previously for Wasco and Sherman counties). Section IX. Policy Statements presents eight sets of findings with corresponding goals and lists of applicable policies; among the findings, goals and policy statements, the only reference to scenic resources is a statement in Findings IV that "This plan was developed in light of the statewide goals relating to agricultural lands (Goal 3); open space, scenic and historic areas and natural resources (Goal 5); air, water and land resource quality (Goal 6); and areas subject to natural disasters (Goal 7)." Based on a review of the document, the Applicant concludes that the Shaniko Comprehensive Land Use Plan does not specifically identify any features as significant or important scenic resources, although it does reference scenic resources identified as important by other jurisdictions.

3.3 Tribes

GIS analysis indicated there are no tribal lands (lands owned by the Tribes, which are different than traditional territories; described further in Exhibit S) located within the analysis area; therefore, this exhibit does not address tribal land management plans.

3.4 Federal

This section addresses federal land management plans that apply to federal lands within the analysis area, as listed in Table R-1. Federal lands within the analysis area are administered by the Prineville District of the BLM. Most of the BLM-managed acreage within the analysis area is distributed in a discontinuous pattern along the Deschutes and White rivers. Additional federal lands occur as relatively small, isolated parcels dispersed widely throughout other parts of the analysis area. Based on the allocation of administrative responsibility and designations for the federal lands, three federal land management plans are applicable: the BLM Two Rivers Resource Management Plan (BLM 1986), the BLM Lower Deschutes River Management Plan (BLM 1993), and the U.S. Department of Agriculture, Forest Service (USFS) White River Wild and Scenic River Management Plan (USFS 1994).

3.4.1 BLM Two Rivers Resource Management Plan

The Two Rivers Resource Management Plan (RMP) (BLM 1986) provides the underlying management direction for approximately 325,000 acres of BLM-administered lands within the Prineville District, including federal lands near the Deschutes and John Day rivers. The Two Rivers RMP Record of Decision (ROD) includes a brief statement of management direction specifically for visual resources. The BLM will complete an analysis of adverse effects on visual qualities before it initiates or permits any major surface-disturbing activities on public land. The Two Rivers RMP ROD notes that "Activities that will result in significant long term adverse effects on the visual resources of the John Day or Deschutes River canyons in areas normally seen from these rivers will not be permitted." The Two Rivers RMP ROD indicates that activities in other areas of high visual quality might be permitted if they do not attract attention, and that activities in other areas will be designed to minimize adverse effects on visual quality. Based on this language in the Two Rivers RMP ROD, BLM management direction specific to visual resources can be characterized as making permitting decisions in part on evaluation of the degree of visual quality effects expected from a proposed action, and whether those effects would be significant.

In addition to the content specific to visual resources, the Two Rivers RMP ROD provides management direction for 13 special management areas identified within the Two Rivers planning area. The Two Rivers RMP ROD identifies the Deschutes and John Day River canyons as a special management area of high visual and natural quality that will continue to be protected. The Two Rivers RMP ROD notes a cooperative role with the Oregon State Parks and Recreation Division, and a map of the special management areas references the Deschutes and John Day State Scenic Waterways.

3.4.2 BLM Lower Deschutes River Management Plan

The Lower Deschutes River Management Plan (BLM 1993) provides direction for approximately 20,600 acres of BLM lands within the designated boundaries of the Lower Deschutes National Wild and Scenic River. This plan amended and supplemented specific aspects of the Two Rivers RMP, primarily with respect to management of recreational use on the Deschutes River. The BLM developed the plan to protect and enhance the river's outstandingly remarkable values while providing adequate levels of recreational use and diversity of opportunities. The plan identifies recreation management goals applicable to the four defined segments of the Lower Deschutes River. The plan defines responsibilities and priorities for protecting and enhancing the natural and cultural resources of the river corridor, including fish habitat, water quality and quantity, wildlife habitat/vegetation, historic/prehistoric resources, recreational activities, public safety and services, and "other resources and uses." Scenic resources are not identified under the latter heading and the plan does not describe management direction specific to scenic resources (which is provided by the Two Rivers RMP). Based on review of the document, the Applicant concludes that the Lower Deschutes River Management Plan does not specifically identify any features as significant or important scenic resources.

3.4.3 USFS White River Wild and Scenic River Management Plan

The Omnibus Oregon Wild and Scenic Rivers Act of 1988 amended the 1968 National Wild and Scenic Rivers Act to add parts of 40 Oregon rivers to the national system. The 1988 legislation designated approximately 53 miles of the White River, extending from its headwaters on Mount Hood to the confluence with the Deschutes River. The act applied scenic and recreational river designations to six defined river segments, identified as Segments A through F, and assigned administrative responsibility to the USFS, Mount Hood National Forest (MHNF) for the upper part of the river within the MHNF boundary and to BLM for the lower part of the river. The analysis area for this exhibit includes Segments E and F and approximately the lower half of Segment D.

The White River National Wild and Scenic River Management Plan (USFS 1994) was prepared by the MHNF with the cooperation of the BLM Prineville District. The plan identifies scenic resources as one of eight outstandingly remarkable values that qualified the White River for inclusion in the national wild and scenic river system. The plan indicates that the outstandingly remarkable scenic values are present in Segments A through D of the river, which span from the headwaters area down to the confluence with Threemile Creek, south of Tygh Valley (approximately 6 miles northwest of the city of Maupin). The plan correspondingly identifies several outstanding viewsheds in the upper sections of the river, including "views into the rugged canyon from several points between the National Forest boundary [located approximately 10 miles upstream from Threemile Creek] and Tygh Valley. The plan does not attribute outstandingly remarkable scenic values or outstanding viewsheds to the lower 8 miles of the river that include Segments E and F, for which the BLM has general jurisdiction. For scenic resource management, the plan states that standards and guidelines apply to the designated viewshed on BLM lands and any lands for which

the BLM acquires a scenic easement. Where applicable, the White River plan updates the previous management direction from the Two Rivers RMP. Based on the provisions that are specifically applicable to the analysis area, this plan does not identify any scenic resource or value within the analysis area for inclusion in this exhibit under OAR 345-021-0010(1)(r)(B).

4.0 Impact Assessment

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

- (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.

4.1 Impact Assessment Methodology

The potential for adverse impacts on scenic resources is based primarily on the expected visibility of the constructed features of the Facility. The Facility will not generate emissions plumes; therefore, no visual impacts from plumes are expected. Clearing and grading of some areas within the site boundary will be needed to facilitate construction of the solar arrays and supporting facilities, including the 230-kilovolt (kV) transmission line, site access roads, battery storage facilities, operations and maintenance (0&M) building, and substation. The grading will be relatively limited in scope and will not result in obvious modifications of the existing landforms. Because Facility solar arrays will be installed on the cleared and graded areas, the solar arrays will obscure evidence of clearing and grading and the predominant visible evidence will be from the Facility components rather than the loss of vegetation or alteration of the landscape.

Given the above reasoning, the fundamental elements of the visual impact analysis involved determining the areas from which the proposed Facility will likely be visible and assessing the expected effect of the facilities on the existing visual setting. The Applicant conducted zone of visual influence (ZVI) analyses (also known as visibility or viewshed analysis), to assess the visibility of the Facility components. The ZVI analyses were performed using the Spatial Analyst extension of the ESRI ArcGIS software. The ZVI analyses employed a 10-meter digital elevation model to represent the terrain within the analysis area. The ArcGIS software generated lines of sight from the three-dimensional coordinates of the proposed solar facilities (i.e., the solar arrays and the battery storage system/O&M building) to points on the terrain surface (factoring a 6-foot offset for viewer height), thereby identifying locations from which the solar facilities will potentially be visible. Because of the varied configuration of the Facility components, the Applicant performed four separate ZVI analyses based on the location and height characteristics of the solar arrays, the transmission line, the overhead collector line, and the battery storage facilities and O&M building. As addressed in Exhibit B, in July 2019 the last 2.5 miles of the transmission line were realigned 30 feet to the north, onto private land newly under lease by the Applicant. The shift in the transmission

line alignment resulted in a corresponding shift of the site boundary. In addition, the site boundary now includes two transmission structures that previously were not considered as part of the Facility. These changes do not add any new scenic resources to the analysis area, nor do they warrant a change to the visual impact methodology.

The bare-earth modeling approach used in the ZVI analyses, based only on the effects of terrain on visibility, results in a conservative assessment of potential visibility. A bare-earth analysis does not take into account the visibility effects of vegetation or buildings, which in practice would block or screen views in some places. In addition, the ZVI model does not account for distance, lighting and atmospheric factors (such as weather) that can diminish visibility under actual field conditions.

Viewshed maps displaying the results of the ZVI analyses were used to determine the extent to which Facility features will potentially be visible from the scenic resources identified in Section 3. Results of the viewshed analyses are discussed in Section 4.2. The viewshed maps were supplemented with information developed through field visits, including photographs taken from representative viewing locations, to confirm or modify the preliminary visibility results. Field records were also used to characterize the existing visual setting. Potential visual effects of the Facility as seen from the scenic resources located within the analysis area were then assessed based on the visibility of the facilities from specific resources, the viewing distance, the degree of new landscape modification created by the Facility, and the expected response of viewers to the changes in the visual setting.

The first step in identifying potential visual impacts to important scenic resources was to determine the potential visibility of the Facility from the respective scenic resources, through review of the ZVI results relative to the scenic resource locations. To the extent the ZVI analyses indicated that the Facility will not be visible from a specific scenic resource, the impact assessment concluded with the determination there will be no adverse impact to that resource. If the ZVI analyses indicated that the Facility will potentially be visible from a specific scenic resource, the impact assessment proceeded to consider how the Facility will appear given the viewing distance and the existing visual context, which both influence the degree of visual contrast that will be introduced by the Facility.

Viewing distance is a key factor in determining the level of visual effect, because perceived contrast generally diminishes with increasing distance between the viewer and the affected area (BLM 1986). The analysis addresses viewing in the context of foreground, middleground, and background distance zones. The foreground zone is defined as occurring from 0 to 0.5 mile from the viewer. Details of Facility elements will be visually clear in the foreground. The middleground zone extends from 0.5 mile to approximately 4 to 5 miles from the viewer. Within this range, viewers still have the potential to distinguish individual forms, and texture and color are still identifiable but become muted and less detailed. Objects beyond the middleground (beyond about 5 miles) are considered to be in the background zone, where texture has disappeared and color has flattened, making objects appear "washed out." Although the shape and mass of the solar arrays may be visible at distances greater than 5 miles (in the background distance zone), they will create limited contrast

and will not appear as a prominent feature in the landscape setting, resulting in minimal or negligible visual impacts.

The existing visual context, and specifically the degree of existing visual contrast introduced by landscape modifications resulting from previous development actions, is also a key factor in determining the level of visual effect for the Facility. The analysis area includes a variety of existing energy, transportation, and communication facilities and other infrastructure features that are notable elements of the existing visual setting. In particular, multiple, large, high-voltage electric transmission lines cross the analysis area and are visually prominent in many locations. Five transmission lines that follow generally east-west and north-south routes currently meet at the Bonneville Power Administration (BPA) Maupin Interconnection Substation (Maupin Substation), the proposed transmission interconnection point for the Facility. In addition, two parallel 500-kV transmission lines run from north to south through the area and connect through the BPA's Bakeoven Substation, which is located along Bakeoven Road just west of the Facility site boundary. Figure C-3 in Exhibit C is a map showing the locations of key energy facilities within the analysis area. The presence of transmission lines and substations creates existing visual contrast that can influence the degree of visual effect of additional landscape modifications, such as the visible elements of the Facility.

4.2 Impact Assessment Results

This section documents the results of the visual impact assessment for the respective scenic resources identified in Section 3. As discussed in Section 4.1, the assessment is based primarily on the results of separate ZVI models for the solar arrays, the transmission line, the overhead collector line, and the battery storage facilities and O&M building (see Exhibit C for detailed mapping of the Facility components). Key results from the ZVI models are displayed in map form in Figures R-2 and R-3.

The local terrain adjacent to the Facility site has a substantial effect on the potential visibility of the Facility, especially regarding the solar components. The proposed locations for the solar arrays and the 230-kV transmission line are in an upland area situated between the canyons of Buck Hollow Creek to the north and east and the Bakeoven Creek system to the south. Elevations reach approximately 2,700 feet just beyond the southern edge of the site boundary and gradually decrease toward the northwest, with typical elevations declining to about 2,300 feet near the western edge of the solar arrays and Bakeoven Substation and to 1,800 feet at Maupin Substation. Low ridges to the east of Hauser Canyon (a tributary of Buck Hollow) and slightly higher terrain to the southwest and north of the site boundary effectively limit potential visibility of the solar facilities in most areas that are beyond 2 or 3 miles of the site.

The ZVI analyses indicate the majority of the Facility components and the overhead collector line will be potentially visible from less than 30 percent of the analysis area. The 230-kV transmission line is the Facility component with the most extensive visibility, although it will potentially be visible from less than 40 percent of the analysis area. Given the nature of the terrain within the analysis area and the distance from scenic resources to the Facility, as discussed below for specific resources, the minor transmission line and site boundary realignment noted in Section 4.1 would

not result in an identifiable change in the ZVI results. Therefore, the ZVI analysis was not updated and the assessment results discussed below remain applicable.

The battery storage facility and the O&M building will have the least potential visibility due to their relatively small area (approximately 13 acres), a maximum height of 20 feet, and their location in the southeastern corner of the proposed site boundary.

The proposed solar arrays are relatively extensive, covering approximately 2,700 acres, but will present a low profile to viewers and in most cases be less than 12 feet tall. The solar array will only reach its maximum height (and maximum tilt) for a short period of time during early morning or evenings when the sun is at its lowest angle. Viewed at a distance or from a similar elevation, the solar arrays will create the overall appearance of a dark line on the horizon. The depth and mass of the solar arrays will be apparent only when viewed from a superior (elevated) position.

Although the potential for glare from the solar panels is sometimes identified as an issue to consider in assessing the visual effects of solar energy facilities, glare is not considered a potential impact mechanism for the Facility because the solar modules will be treated with antiglare coating that nearly eliminates the reflection of sunlight off the module face. The solar arrays are designed to generate power through the absorption of sunlight, resulting in limited reflectivity (glare) that may also be visible within the surrounding area. The solar modules will be mounted on a tracking system that rotates the modules throughout the day as the sun's angle changes. The movement of the modules, combined with the solar module's antireflective coating, will minimize glare. Top-tier modern photovoltaic solar modules use a sophisticated antireflective coating to nearly eliminate the reflection of sunlight off the module face. A typical human eye reacts to light wavelengths from 390 to 700 nanometers and, in that spectrum, the antireflective-coated glass on a typical module will have a high-level transmittance of at least 90 percent. Transmittance is the percent of radiation (light) that travels through a surface. Such a high level of transmittance is important because it means that more light is traveling through the glass and onto the photovoltaic cells, rather than reflecting off the surface. The solar modules will have transmittance values higher than those for a body of water or a glass window without an antireflective coating, and therefore lower potential for glare compared to these other surfaces. Based on systematic observations of solar facilities in the American Southwest, researchers from the Argonne National Laboratory (Sullivan et al. n.d.) found that thin-film photovoltaic facilities "were not observed to generate glare." Therefore, the contrast introduced by the solar arrays will be associated with the basic elements of the facilities (form, line, color and texture) as discussed above, and will not be increased by the presence of glare from the arrays.

The viewshed analysis indicates that the Facility components will potentially be visible within less than half of the analysis area. The viewshed results were evaluated to identify which Facility components will potentially be visible from the identified important or significant scenic resources. The assessment evaluated the potential for significant adverse impacts on important or significant scenic resources based on the viewing distance and the degree of additional contrast introduced to the existing visual setting. The results of this process are summarized in Table R-2. In general, significant impacts on the listed scenic resources are not anticipated due to the distance from the Facility to the respective scenic resources (at least 2.5 miles); intervening topography that blocks

views toward the Facility from many potential viewing locations within the identified scenic resources; the presence of visual contrast created by existing infrastructure and other landscape modifications; and the limited degree of additional contrast created by transmission structures and/or the low stature of the proposed solar array (12 feet or less). The specific conclusions for each important or significant scenic resource are described below.

Table R-2. Summary of Impact Assessment for Important or Significant Scenic Resources

Jurisdiction	Name of Scenic Resource	Distance from Site Boundary (mi.)	Facility Components Potentially Visible	Assessment Results
	Deschutes River Canyon	2.5	Transmission line (unlikely, and not at river level)	No visibility or impact at river level where users are likely to be present; no significant impact
	White River Canyon	3	None	No impact
	US Highway 97, MP 48.81 – MP 56.04	8	None	No impact
	US Highway 97, MP 56.72 – MP 68.66	8	Transmission line and overhead collector line for 2-2.5 miles	Weak visual contrast, no significant impact
Wasco County	US Highway 197, MP 22.42 – MP 43.83	4	Solar facilities, transmission line, and overhead collector line for 5-6 miles	Weak visual contrast, no significant impact
	US Highway 197, MP 47.00 – MP 50.00	3	Transmission line for 3 miles	Weak visual contrast, no significant impact
	OR Highway 216, MP 0.00 – MP 26.17	5	Solar facilities, transmission line, and overhead collector line for 6 miles	Weak visual contrast, no significant impact
	OR Highway 216, MP 6.00 – MP 8.30	4	None	No impact
	OR Highway 218, MP 0.56 - MP 7.31	8	None	No impact
Sherman County	Deschutes River Canyon	5	Transmission line (unlikely, and not at river level)	No visibility or impact at river level where users are likely to be present; no significant impact

Jurisdiction	Name of Scenic Resource	Distance from Site Boundary (mi.)	Facility Components Potentially Visible	Assessment Results
	US Highway 97, MP 30 – MP 48.81	8	Solar facilities, transmission line, and overhead collector line for up to 2-3 miles	Weak visual contrast, no significant impact
	OR Highway 216, MP 8.3 – MP 11	4	None	No impact
BLM	Deschutes River Canyon	2.5	Transmission line (unlikely, and not at river level)	No visibility or impact at river level where users are likely to be present; no significant impact

4.2.1 Wasco County

4.2.1.1 Deschutes River Canyon

The Deschutes River Canyon is a state-designated scenic waterway and is listed in the Wasco County Comp Plan as an outstanding scenic and recreation area; therefore, it is identified as a significant scenic resource. The entire length of the Deschutes River in Wasco County is within the state scenic waterway designation. The Deschutes River from approximately river mile 65 near Dent Ferry downstream to approximately river mile 32, below Jones Canyon and west of Grass Valley, is within 10 miles of the site boundary.

The viewshed analyses indicates that no parts of the Deschutes River Canyon will have potential visibility of any solar arrays (see Figure R-2) or the battery storage/O&M structures, because the canyon terrain will block outward views toward these elements. The transmission line viewshed analysis (see Figure R-2) indicates that there could be intermittent, potential visibility of the transmission line only along approximately 3 miles of the canyon, from Maupin (river mile 52) upstream to about Wapinitia Creek (river mile 55). This section of the canyon is oriented in a southwest-northeast direction that allows possible views of BPA's Maupin Substation, which is the western terminus of the proposed 230-kV transmission line. To further assess this potential view of Facility components, the Applicant conducted a field review to confirm or modify the results of the ZVI analysis. The field review demonstrated that the canyon walls effectively block views toward the Facility components along the Deschutes River Road throughout this part of the canyon; because there were no locations at which the Maupin Substation was visible, there were no locations at which the Facility's 230-kV transmission line approaching the substation will be visible. Figure R-4 presents a representative photograph of the enclosed views within this part of the canyon as seen from the Wapinitia recreation site.

It is conceivable that the Maupin Substation and the Facility's 230-kV transmission line might be visible from some elevated points on the canyon walls above river level or about Deschutes River Road, particularly on the west side of the river; the field review did not include an attempt to investigate visibility conditions away from the river itself. As most people experience the views of the Deschutes River Canyon from the river level or adjacent roads, a steep canyon wall generally discourages recreational use. To the extent that the transmission line might be visible from locations on the canyon walls, it will be seen at a middleground distance of approximately 2.5 to 5 miles. The Maupin Substation is a large facility that is a connection point for multiple existing transmission lines entering the substation from all directions. Therefore, any current outward views from the Deschutes River Canyon between Maupin and Wapinitia Creek already include visual evidence of noticeable electrical infrastructure, in addition to a railroad, roads that enter/exit the canyon, and urbanized development in Maupin.

In summary, the Facility transmission line will not be visible and will have no visual effect from Deschutes River Canyon locations that are likely to be frequented by river users. Potential views of the transmission line, if any, will be limited to elevated canyon locations where viewers are unlikely to be present. Based on the middleground or background viewing distance and the degree of existing landscape modification present in the subject reach of the canyon, the transmission line will create—at most—weak, additional contrast within the current visual context, and that contrast will be seen by few or no viewers. The minor July 2019 realignment of the transmission line along the last 2.5 miles of the route, and the associated site boundary shift, do not change this assessment. Therefore, the Facility will not have a significant, adverse impact on the scenic resource values associated with the Deschutes River Canyon in Wasco County.

4.2.1.2 White River Canyon

The Wasco County Comp Plan identifies the lands within the White River Canyon as an outstanding scenic and recreational area. The lower 10-mile reach of this river is within 10 miles of the site boundary. The viewshed analysis indicates that no parts of the White River Canyon will have potential visibility of any solar components (see Figures R-2 and R-3), as the canyon is narrow and deep enough that the canyon walls will block outward views toward the Facility. Similarly, no parts of the canyon will have potential visibility of the transmission line (see Figure R-2). Therefore, the Facility will have no impact on the scenic resource values associated with the White River Canyon in Wasco County.

4.2.1.3 U.S. Highway 97

The Wasco County Comp Plan identifies approximately 20 miles of US 97 within Wasco County as a designated scenic area. The designation applies to the entire highway from the Wasco/Sherman county line to the junction with US 197 (known as Shaniko Junction), with the exception of the short highway segment within the city limits of Shaniko. The scenic area designation applies to all areas within view from the US 97 segments (which are referred to for purposes of this analysis as the northern segment and the southern segment).

The northern segment of US 97, from the Sherman County line to Shaniko, is entirely within the analysis area. This segment of the highway passes through open terrain that provides expansive views in most directions. The viewshed analyses indicate that none of the solar facilities will be visible along this 8-mile highway segment, nor will structures on the transmission line (see Figure R-2).

The analysis area includes approximately 7 miles of the southern segment of US 97 from Shaniko to Shaniko Junction. West of Shaniko, the highway crosses a stream drainage that reduces local visibility in this area, but elsewhere the terrain is mostly open with expansive views. The viewshed analyses indicate that structures on the 230-kV transmission line and overhead collector line will potentially be visible in the vicinity of Shaniko Summit near MP 62, where the highway runs along a minor drainage divide, in two short stretches of the highway totaling 2 to 2.5 miles in distance (representing a combined duration of about 2 to 3 minutes of travel time). The viewshed analyses indicate that none of the solar facilities will be in view from this highway segment. The distance from this part of US 97 to the Facility will be approximately 9 miles. Based on the background viewing distance and the limited visual prominence of the 230-kV transmission line and collector line, they will create—at most—weak visual contrast within the current visual setting that will not likely attract the attention of viewers traveling on US 97. The minor July 2019 realignment of the transmission line along the last 2.5 miles of the route, and the associated site boundary shift, do not change this assessment. Therefore, the Facility will not have a significant adverse impact on the scenic resource values associated with US 97 in Wasco County.

4.2.1.4 U.S. Highway 197

The Wasco County Comp Plan identifies two segments of US 197 as significant scenic resources, including 22 miles from Tygh Ridge Summit to the west edge of Maupin and a 3-mile segment extending beyond the south edge Maupin. Almost all of the 25-mile section of US 197 is within the analysis area (see Figure R-3). The scenic highway designation applies to all areas within view from these US 197 segments.

The portion of US 197 south of Tygh Ridge Summit follows a northwest-southeast path within a drainage of the White River valley for 5 to 6 miles and has limited outward views. The viewshed analyses indicate that no Facility components will be visible in this northerly stretch of US 197.

The viewshed analysis suggests that Facility components could be potentially seen from the central stretch of US 197 on Juniper Flat near the junction of US 197 and OR 216 (see Figure R-5 for a representative photo from this junction). The viewshed analyses indicate that solar arrays will potentially be in view for most of this highway segment to the west edge of Maupin; less than about one-third of the solar array will potentially be visible in this area (see Figure R-3). Based on the viewing distance of 10 miles or more and the low profile of the solar arrays, it is not anticipated that the solar array will be noticed by viewers along the highway. The 230-kV transmission line and overhead collector line will also be potentially visible from US 197 on Juniper Flat west of Maupin. Where these lines will likely be visible, they will be seen at distances ranging from about 3 to over 10 miles. In addition, existing transmission lines will be included in the view and will generally be at closer viewing distances. (See Figure C-3 in Exhibit C for a map of existing energy facilities near

the Facility site.) Based on the existing visual context and the substantial viewing distances, the contrast introduced by the transmission facilities will be weak and subordinate to other elements in the view. The minor July 2019 realignment of the transmission line along the last 2.5 miles of the route, and the associated site boundary shift, do not change this assessment. Therefore, the adverse visual impacts from the Facility on the scenic resource values along the central stretch of US 197 in the analysis area will not be significant.

The viewshed analyses indicate that the solar arrays will not be in view within the 3-mile segment of US 197 south of Maupin (see Figure R-2). The 230-kV transmission line will be potentially visible in most of the 3-mile highway segment south of Maupin (see Figure R-2), although the overhead collector line will not be visible. Where one or more structures on the transmission line will likely be visible, they will be seen at distances ranging from about 3 to 10 miles. In addition, there is an existing transmission line supported on lattice-steel structures located roughly parallel to US 197 and approximately 2.5 miles to the east. This existing line will be included in views from along US 197 and will be located between the viewer and the 230-kV transmission line. Based on the existing visual context and the substantial viewing distances, the visual contrast introduced by the Facility transmission line will be weak and subordinate to other elements in the view. Therefore, the adverse visual impacts from the Facility on the scenic resource values along US 197 south of Maupin will not be significant.

4.2.1.5 *Oregon Highway 216*

The Wasco County Comp Plan identifies two segments of OR 216 as significant scenic resources. These include a 26-mile western segment from US 26 to the junction with US 197 northwest of Maupin, and a 2.3-mile eastern segment near Sherar's Falls and the Wasco/Sherman county line at the river. The scenic highway designation applies to all areas within view from the western OR 216 segment and to the area within 660 feet on both sides of the eastern segment. The analysis area includes approximately 6 miles of the western segment of OR 216 as it approaches US 197, and the entire eastern segment near Sherar's Falls.

The viewshed analyses indicate that the Facility solar arrays will potentially be visible within the western segment of OR 216; less than about one-third of the solar array will potentially be visible in most of this area (see Figure R-3). The Facility transmission line and overhead collector line will also potentially be visible from the western OR 216 segment. Figure R-6 is a photo taken from OR 216 approaching the junction of US 197 that is representative of views from this highway segment. The distances from the highway to the Facility will be 4 miles and greater. The impact results discussed above for US 197 west of Maupin can also be applied to locations along this segment of OR 216. If any of the Facility components were visible, they will be seen at long distances and within an existing context that includes landscape modification from transmission lines and other infrastructure development at closer viewing distances. Consequently, contrast levels at locations along this segment of OR 216 will be weak and the impact level will be low or negligible. Therefore, potential visual impacts from the Facility along OR 216 in the referenced area will not be significant.

Viewshed analyses indicate that the solar facilities, the transmission line, and the overhead collector line will not be visible from locations along the eastern segment of OR 216, which is located within the lower portion of the valley of Winter Water Creek near the Deschutes River. Therefore, the Facility will have no visual impact on this segment of Highway 216.

4.2.1.6 *Oregon Highway 218*

The Wasco County Comp Plan identifies two segments of OR 218 as significant scenic resources. These include a 7-mile segment from Shaniko to the north edge of Antelope and from the east edge of Antelope to the Wasco/Wheeler county line near Clarno. The scenic highway designation applies to the area within 660 feet on both sides of the highway for both segments. The analysis area includes only approximately 6 miles of the segment of OR 218 from Shaniko to Antelope.

The viewshed results indicate that none of the solar arrays will potentially be in view from OR 218 south of Shaniko, nor will the 230-kV transmission line or overhead collector line. Therefore, the Facility will have no adverse visual impact on the scenic values associated with OR 218 within Wasco County.

4.2.2 Sherman County

4.2.2.1 Deschutes River Canyon

The Deschutes River Canyon is a state-designated scenic waterway and is listed in the Sherman County Comp Plan as an outstanding scenic and recreation area; therefore, it is identified as a significant scenic resource. The Deschutes River forms the western boundary of Sherman County (with Wasco County on the opposite side of the river) and the entire length of the river in Sherman County is within the state scenic waterway designation. The waterway designation from approximately river mile 43 below Sherar's Falls downstream to approximately river mile 32, below Jones Canyon and west of Grass Valley, is within 10 miles of the site boundary.

The viewshed analyses indicate that no parts of the Deschutes River Canyon in Sherman County will have potential visibility of any Facility solar arrays (see Figure R-2) or the battery storage/O&M facilities, as the canyon terrain will block outward views toward the Facility. Similarly, the viewshed analyses indicate that there will not be potential visibility of the 230-kV transmission line or overhead collector line at or near river level within this part of the canyon. Figure R-2 shows two small areas of potential visibility for the transmission line on privately-owned lands on the canyon walls well above river level on both the east and west sides of the river, near the confluence with Elder Creek; the Applicant's field review did not include an attempt to investigate visibility conditions away from the river itself. To the extent that the transmission line might be visible from locations on the canyon walls, it will be seen at a distance of more than 5 miles, and with the Maupin Substation also within the view. Therefore, any current outward views from the Deschutes River Canyon below Sherar's Falls already include visual evidence of noticeable electrical infrastructure, in addition to a railroad and roads within the canyon. Based on the background viewing distance and the degree of existing landscape modification present in the subject reach of

the canyon, the transmission line will create—at most—weak additional contrast within the current visual context, and that contrast will be seen by few or no viewers. The minor July 2019 realignment of the transmission line along the last 2.5 miles of the route, and the associated site boundary shift, do not change this assessment. Therefore, the Facility will have no adverse impact on the scenic resource values of the Deschutes River Canyon in Sherman County.

4.2.2.2 U.S. Highway 97

Approximately 19 miles of the designated scenic segment of US 97 south of Grass Valley is within the analysis area. The landscape and viewing conditions along this highway segment are similar to those described above for US 97 in Wasco County. The highway passes through generally open terrain that provides expansive views in most directions. Figure R-7 is a photo taken from US 97 near the small, unincorporated community of Kent that is representative of views from this highway segment. The viewshed analyses indicate that the solar arrays will potentially be visible in two areas along this highway segment (see Figure R-2). One area includes less than 0.5 mile of highway where it passes through the small, unincorporated community of Kent. In this location, only a small proportion of the Facility solar arrays will potentially be visible, and the distance to the closest arrays will be more than 8 miles. The other area includes approximately 4 miles of the highway from Bourbon Lane to the northern edge of the analysis area, where the specific locations of potential visibility are intermittent. In this area, more than half of the solar arrays will potentially be visible, and the distance to the closest arrays will range from about 8 miles to more than 9 miles. The 230-kV transmission line and overhead collector line will also be potentially visible (Figure R-2) in essentially the same locations of this US 97 segment, at viewing distances of 8 miles or more.

Based on the background viewing distance and the limited visual prominence of the Facility solar arrays, they will create—at most—weak visual contrast within the current visual setting that will not likely attract the attention of viewers traveling on US 97. Therefore, the Facility will not have a significant adverse impact on the scenic resource values associated with US 97 in Sherman County.

4.2.2.3 *Oregon Highway 216*

The Sherman County Comp Plan designates a short segment of OR 216 near Sherar's Falls as a scenic highway; the entire segment is within the analysis area. The designated segment extends from the Deschutes River to milepost (MP) 11 at the eastern rim of the river canyon. The highway follows a north-south orientation along the floor of Buck Hollow where it is near the Deschutes River, then follows a generally east-west alignment through a tributary canyon. The canyon terrain limits views to the foreground distance zone in most of this segment. At MP 11, the canyon wall blocks views to the southeast, in the direction of the Facility, although views to the south and southwest include the opposite wall of the Deschutes River canyon and elevated terrain beyond in the distance (see Figure R-8). The viewshed analyses indicate that none of this highway segment in Sherman County will have potential visibility of any Facility solar arrays, the transmission line, overhead collector line, or the battery storage/O&M facilities (see Figure R-2), because the canyon

wall limits views to the foreground. Therefore, the Facility will not be visible from the OR 216 scenic segment in Sherman County and will have no adverse impact on this scenic resource.

4.2.3 Bureau of Land Management

As noted in Section 3.4, the Deschutes River Canyon is the only feature within the analysis area identified as an important scenic resource based on direction provided in the applicable federal land management plans. The geographic location of this scenic resource is the same as described for the resource identified in the Wasco County Comp Plan, including the river canyon extending from approximately river mile 65 near Dent Ferry downstream to approximately river mile 32, below Jones Canyon and west of Grass Valley. Therefore, the impact results presented above in Section 4.2.1.1 also apply to the scenic resource feature as identified by the BLM. In summary, no parts of the Deschutes River Canyon will have potential visibility of any Facility solar arrays or the overhead collector line. The transmission line viewshed analysis (see Figure R-2) indicates that there will be intermittent, but potential, visibility of the transmission line along approximately 3 miles of the canyon, from Maupin (river mile 52) upstream to about Wapinitia Creek (river mile 55). Field investigation demonstrated that the canyon walls also block outward views to the east along this part of the river and confirmed that the Maupin Substation is not visible from the east side of the river above Maupin. Therefore, none of the Facility features will be visible from at or near river level in the Deschutes River Canyon, and the Facility will not have a significant adverse impact on this scenic resource.

5.0 Mitigation

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

While no significant adverse impacts to scenic resources have been identified, the Applicant will implement the following best management practices into the Facility design:

- Use solar modules with antireflective coating to minimize the potential for glare.
- Limit the length of overhead collector lines.
- Use permanent lighting fixtures with down shielding to limit off-site lighting.
- Paint the O&M building in a low-reflectivity, neutral color to blend with the surrounding landscape.
- Limit signage to those needed for manufacturer's or installer's identification, appropriate warning signs, or owner identification.

6.0 Monitoring

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

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

7.0 Conclusion

This exhibit provides the required information pursuant to OAR 345-021-0010(1)(r)(A) through (F), and 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 and the Facility complies with OAR 345-022-0080.

8.0 Submittal Requirements and Approval Standards

8.1 Submittal Requirements

Table R-3. Submittal Requirements Matrix

Requirement	Location
OAR 345-021-0010(1)(r) An analysis of significant potential impacts of the proposed facility, if any, on scenic resources 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, providing evidence to support a finding by the Council as required by OAR 345-022-0080, including:	-
(A) A list of the local, tribal and federal plans that address lands within the analysis area.	Section 3.0
(B) Identification and description of the scenic resources identified as significant or important in the plans listed in (A), including a copy of the portion of the management plan that identifies the resource as significant or important.	Section 3.0
(C) A description of significant potential adverse impacts to the scenic resources identified in (B), including, but not limited to, impacts such as:	Section 4.0
(i) Loss of vegetation or alteration of the landscape as a result of construction or operation; and	Section 4.0
(ii) Visual impacts of facility structures or plumes.	Section 4.0
(D) The measures the applicant proposes to avoid, reduce or otherwise mitigate any significant adverse impacts.	Section 5.0
(E) A map or maps showing the location of the scenic resources described under (B).	Figure R-1

Requirement	Location
(F) The applicant's proposed monitoring program, if any, for impacts to scenic resources.	N/A

8.2 Approval Standards

Table R-4. Approval Standard

Requirement	Location
OAR 345-022-0080 Scenic Resources	
(1) Except for facilities described in section (2), 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 impact 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.	Sections 3.0 through 5.0
(2) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.	N/A

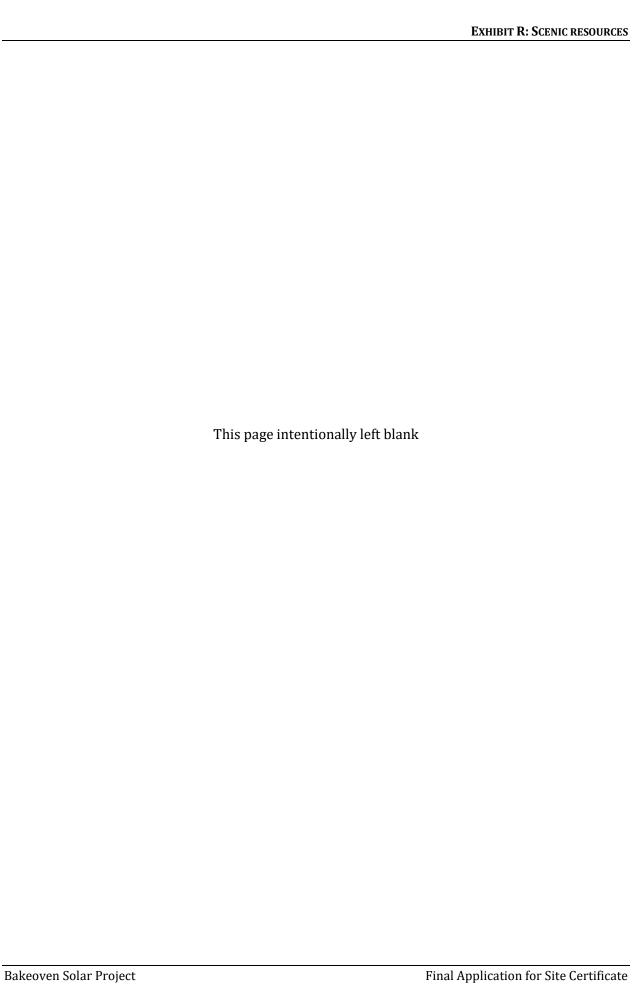
9.0 References

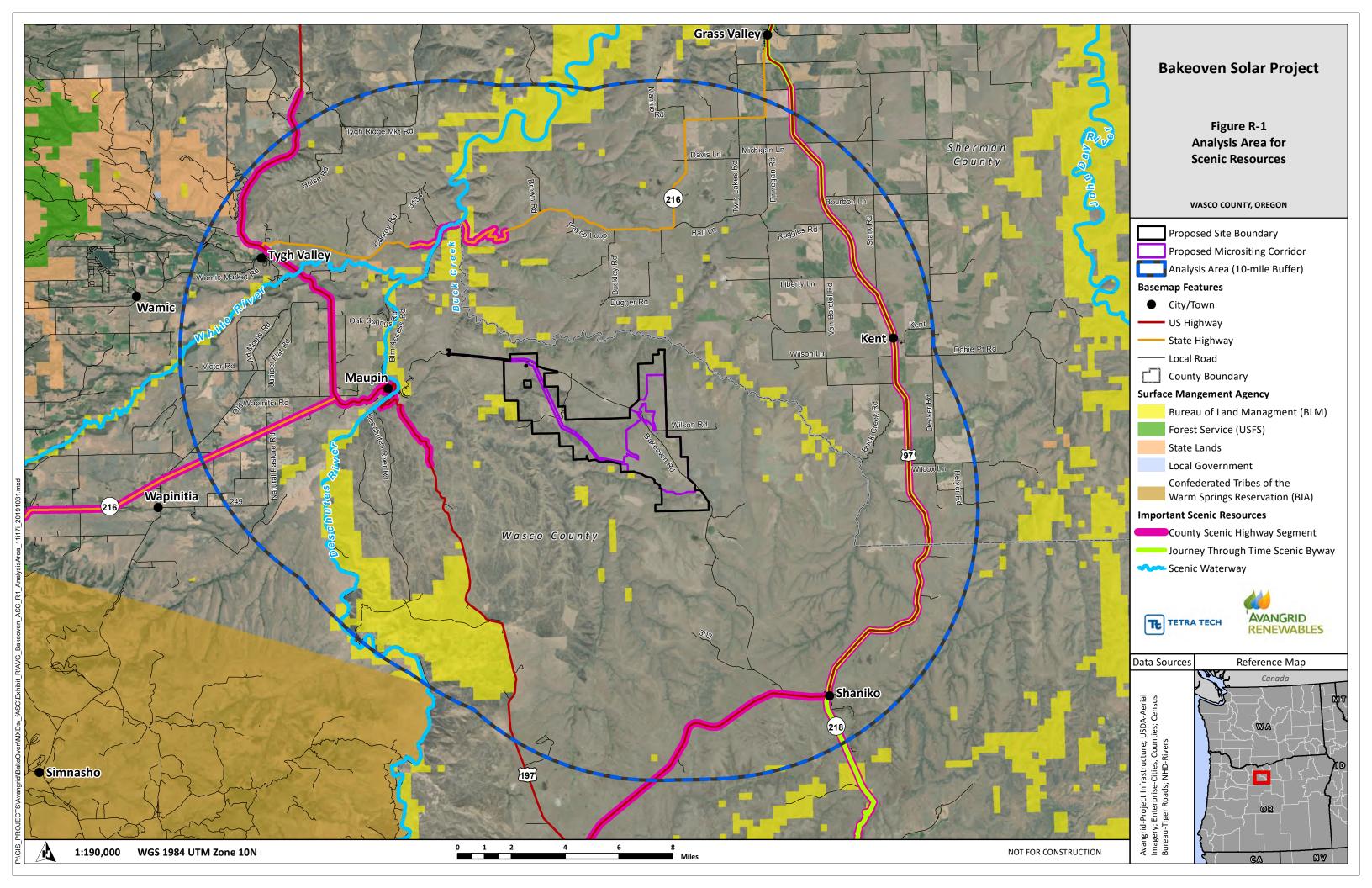
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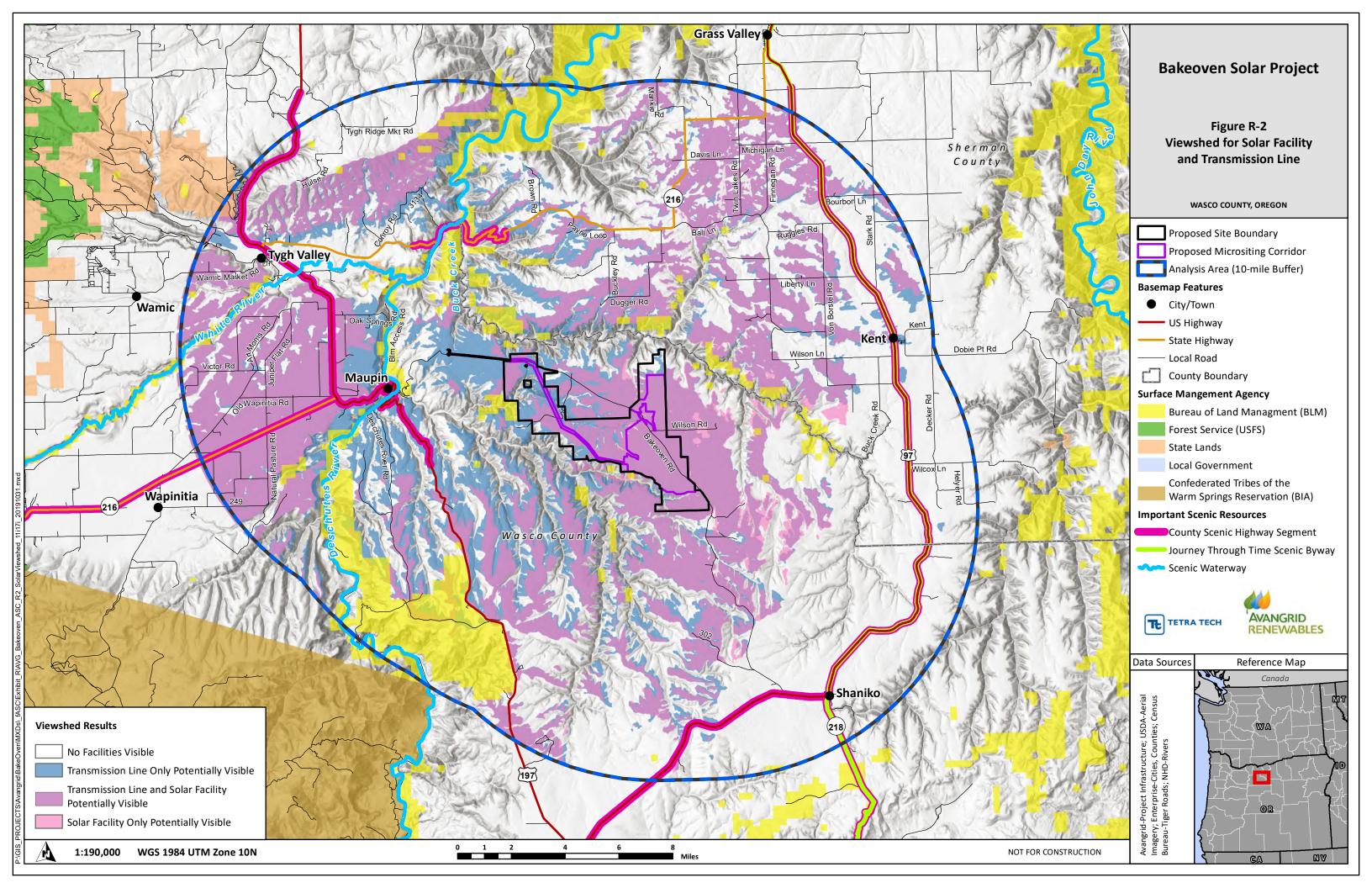
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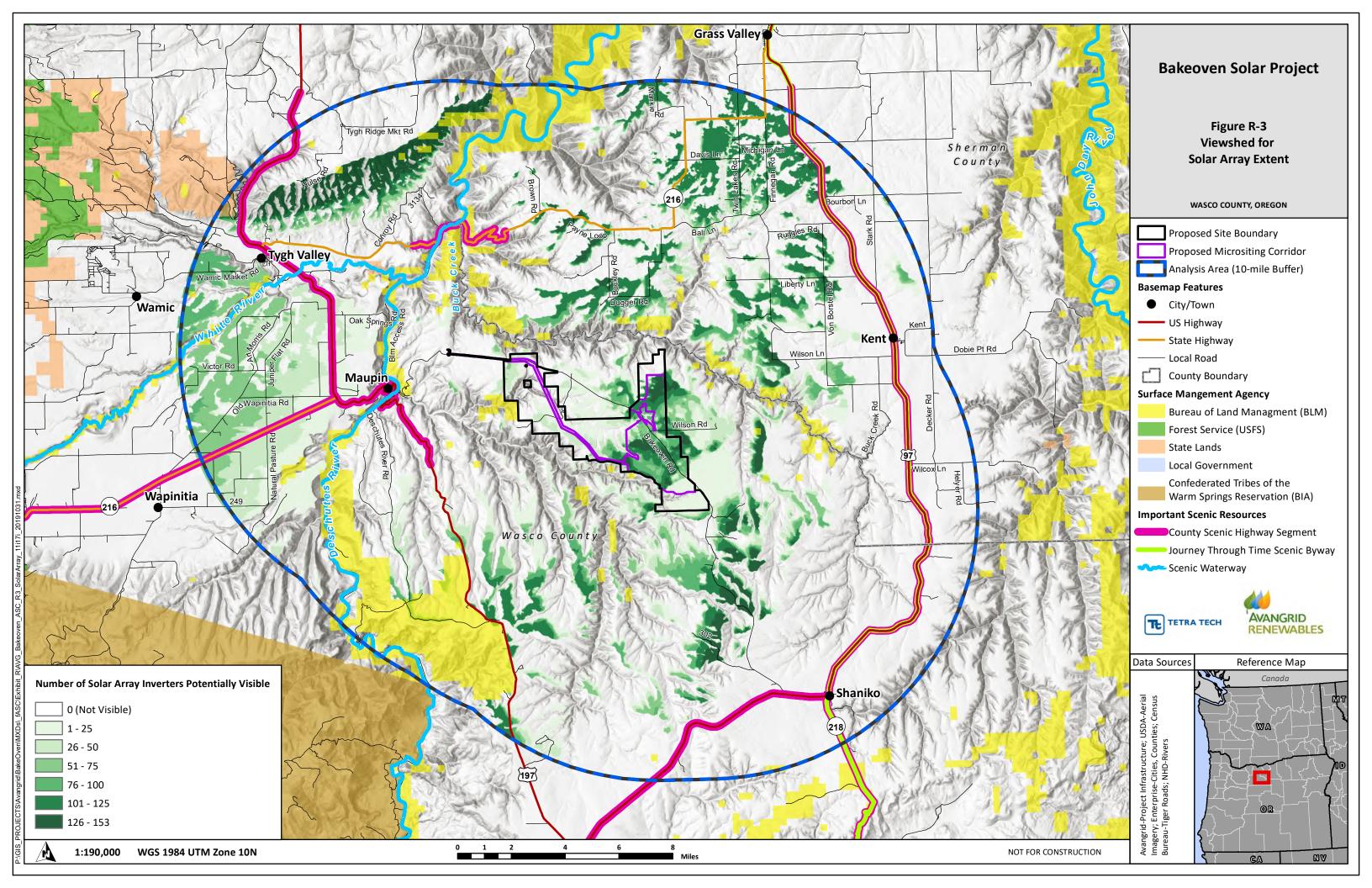
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Figures













Bakeoven Solar Project

Figure R-4.
Deschutes River Canyon Representative
Photo, Wapinitia Site





Bakeoven Solar Project

Figure R-5. US 197 and OR 216 Junction Representative Photo, Juniper Flat Area





Bakeoven Solar Project

Figure R-6.
OR 216 Representative Photo Near
Junction with US 197





Bakeoven Solar Project

Figure R-7. US 97 Representative Photo Near Community of Kent





Bakeoven Solar Project

Figure R-8.
OR 216 Representative Photo, MP 11



