

Exhibit T

Recreation

Nolin Hills Wind Power Project
February 2020



d/b/a Nolin Hills Wind, LLC

Prepared by



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Acronyms and Abbreviations

ACEC	Area of Critical Environmental Concern
Applicant	Nolin Hills Wind, LLC
BLM	Bureau of Land Management
GIS	Geographic Information System
NPS	National Park Service
OAR	Oregon Administrative Rule
ODFW	Oregon Department of Fish and Wildlife
OHTAC	Oregon Historic Trails Advisory Committee
ONHT	Oregon National Historic Trail
OPRD	Oregon Parks and Recreation Department
OR	Oregon Highway
Project	Nolin Hills Wind Power Project
RV	recreational vehicle

1.0 Introduction

Exhibit T contains information pertaining to potential adverse impacts of construction and operation of the proposed Nolin Hills Wind Power Project (Project) on important recreational opportunities, as required to meet the submittal requirements in Oregon Administrative Rules (OAR) 345-021-0010(t) paragraphs (A) through (E). This exhibit demonstrates that the Project can comply with OAR 345-022-0100:

OAR 345-022-0100

(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order. The Council shall consider the following factors in judging the importance of a recreational opportunity:

- (a) Any special designation or management of the location;*
- (b) The degree of demand;*
- (c) Outstanding or unusual qualities;*
- (d) Availability or rareness; and*
- (e) Irreplaceability or irretrievability of the opportunity.*

The Analysis Area for recreational opportunities is defined in the Project Order as “the area within the Site Boundary and 5 miles from the Site Boundary,” except that the Analysis Area for the transmission line is only the area within the Site Boundary. The Site Boundary is defined in detail in Exhibits B and C. The boundary of the recreational opportunities Analysis Area is shown on Figure T-1.

2.0 Recreational Opportunities in the Analysis Area – OAR 345-021-0010(1)(t)

OAR 345-021-0010(1)(t) Exhibit T. Information about the impacts the proposed facility would have on important recreational opportunities in the analysis area, providing evidence to support a finding by the Council as required by OAR 345-022-0100, including:

- (A) A description of the recreational opportunities in the analysis area that includes information on the factors listed in OAR 345-022-0100(1) as a basis for identifying important recreational opportunities;¶*

2.1 Inventory Methods

Recreational opportunities within the Analysis Area were identified through collection and review of existing published and unpublished information available from desktop research sources commonly used for recreation inventory efforts. Key types of information resources investigated for the inventory included the following:

- Published maps with geographic coverage applicable to the Analysis Area. Specific sources included U.S. Geological Survey 1:100,000 scale and 1:24,000-scale topographic maps, and maps published by federal and state land management agencies, primarily the Bureau of Land Management (BLM).
- Geographic Information System (GIS) files documenting recreational resources obtained from key recreation provider agencies, including the BLM, National Park Service (NPS), Oregon Department of Parks and Recreation (OPRD), and Oregon Department of Fish and Wildlife (ODFW).
- Land management agency planning documents.
- Comprehensive plans, park and recreation plans, and individual park master plans prepared by OPRD and by counties and municipal governments within the Analysis Area.
- Internet sites maintained by recreation provider agencies, including OPRD and county and city park departments.
- Internet sites maintained by various commercial entities, including sites providing general recreation and tourism information and sites applicable to specific private-sector recreation opportunities.

2.2 Summary of Recreational Opportunities

Recreational activities occurring within the Analysis Area include hiking/walking, fishing, boating, camping, bicycling, photography, game and bird hunting, and sightseeing. These activities also occur in numerous locations outside the Analysis Area, and therefore some of the recreational opportunities identified within the Analysis Area do not rise to the level of uniqueness or irreplaceability that is required by OAR 345-022-0100(1).

There are six identified recreational opportunities within the Analysis Area. Most of the opportunities are provided by the City of Echo; they include two parks, an arboretum, and a golf course open to the public. A private organization operates a commercial hunting club near the Umatilla River east of Echo, and a private landowner allows access to a site southeast of Echo where Oregon Trail ruts are visible.

A portion of the identified route of the Oregon Trail is located within the Analysis Area. However, no specific, protected elements of the Oregon National Historic Trail (ONHT) are located within the Analysis Area, as discussed in Section 2.2.1.

Inventoried recreational opportunities within the Analysis Area are described below in order of federal, state, local and private ownership/management. Table T-1 (see Section 2.3.1) provides a summary of each identified recreational opportunity, and an assessment of the importance of each opportunity. Figure T-1 shows the location of the recreational opportunities identified in the Analysis Area.

2.2.1 Federal

Congress designated the route of the ONHT in 1978, and the Oregon Historic Trails Advisory Committee (OHTAC) was created to provide public input and advice to the NPS on management of historic trails in Oregon. The National Historic Trail designation applies to a general, primary route (and two specified branches) extending approximately 2,000 miles from Independence, Missouri to Oregon City, Oregon. The Oregon Trail designation was intended to preserve the legacy of the westward immigration of settlers to the Oregon Territory, based on routes used from 1841 to 1848 (NPS 1999). In recognition of the intermittent evidence of many of the historic trail routes, the National Trails System Act provided for the identification of “high-potential sites and segments” along these routes, using specified criteria for historic significance, the presence of visible historic remnants, scenic quality, and relative freedom from intrusion. High-potential segments are portions of a trail route that afford high-quality recreational experiences in areas that have greater than average scenic values or afford the opportunity to vicariously share the experience of the original trail users, while high-potential sites are specific locations with similar attributes. Each site or segment must have the potential to interpret the trail’s historical significance and to provide opportunities for high-quality recreation.

In Umatilla County, the designated Oregon Trail route runs from Deadman Pass down Emigrant Hill to the Pendleton area, westward to cross the Umatilla River at Echo, and continues westward to cross Oregon Highway (OR) 207 before turning southwesterly to cross Butter Creek and into Morrow County. In Morrow County, the designated Oregon Trail route runs across the southern end of the Boardman Bombing Range, then southwesterly and westerly. NPS has formal responsibility for administering the Oregon Trail and preserving the remaining trail segments. Approximately 20 miles of the 2,000-mile route are within the Analysis Area. The trail route passes within approximately 1.2 miles of the northern edge of the primary Site Boundary and crosses both transmission line route options.

In many areas, visible evidence of the Oregon Trail has been erased from the landscape by generations of agricultural activity. In others, it has been replaced by newer roads. The NPS (1999) management plan identifies a 12-mile Boardman Segment of the trail in Morrow County (outside the Analysis Area) as a high-potential trail segment; the plan does not identify any other high-potential trail segments within or near the Analysis Area. The plan indicates that the portion of the ONHT route in western Umatilla County includes one high-potential site, the Echo Meadows Interpretive Site. The Echo Meadows site is managed by BLM as the Oregon Trail Area of Critical Environmental Concern (ACEC; BLM 1989, 2018); as such it is considered a protected area for the analysis in Exhibit L of this application. The Echo Meadows site is located approximately 0.2 mile

north of the Site Boundary for the Umatilla Energy Cooperative transmission interconnection route. Therefore, the Echo Meadows site is not within the Project Analysis Area, nor are any specific, protected elements of the ONHT.

There are no other federal lands or lands managed by a federal agency within the Analysis Area.

2.2.2 State

There are no lands owned or managed by the State of Oregon within the Analysis Area except for state highway rights-of-way. No state parks or designated scenic byways are located within the Analysis Area (OPRD 2018; Oregon.gov 2018).

2.2.3 Local Governments and Special Districts

Local government resources tend to be smaller-scale parks with an emphasis on day-use activities and typically serve more localized user populations. The City of Echo is the only local government entity that provides recreational opportunities within the Analysis Area. Umatilla County does not have any parks or recreation areas within the Analysis Area, and no other cities are located within the Analysis Area.

The recreational opportunities provided by the City of Echo (2018) include Fort Henrietta Park, the Oregon Trail Arboretum, F.T. George Park, and the Echo Hills Golf Club. The attributes of these municipal opportunities are summarized in Table T-1. These recreational opportunities are all small and primarily serve the residents of Echo.

2.2.4 Private

Two recreational opportunities provided by private-sector entities were identified within the Analysis Area. The Horseshoe Curve Hunt Club (2018) operates an approximately 650-acre property located approximately 0.2 mile northeast of the Project Site Boundary, along the east side of the Umatilla River and 10 miles west of Pendleton. The club offers lodging and guided hunting for upland birds, waterfowl, and deer during open hunting seasons.

No ODFW Access and Hunting Program sites were identified within the Analysis Area (ODFW 2018).

A private landowner has for some time allowed public access to the Corral Springs ONHT site, located approximately 5 miles southeast of Echo (City of Echo 2018) and approximately 0.5 mile north of the portion of the Site Boundary containing the Project turbines. The property includes 0.25 mile of visible Oregon Trail ruts descending into a small canyon, and space for parking vehicles.

2.3 Important Recreational Opportunities

2.3.1 Importance Criteria

Recreational opportunities identified within the Analysis Area were evaluated for importance based on the criteria outlined in OAR 345-022-0100. Specifically, the importance of each recreational opportunity was rated based on:

- Any special designation or management of the location;
- The degree of demand;
- Outstanding or unusual qualities;
- Availability or rareness; and
- Irreplaceability or irretrievability of the opportunity.

The importance of the identified recreational opportunities was determined based on assessment of available information specific to each criterion and a qualitative balancing of the attributes for all five criteria for a given resource. Specific considerations used to characterize an opportunity relative to the five importance criteria are summarized as follows:

- 1) There can be distinct, identifiable differences among the types of special management designations that apply to lands within an Analysis Area and their implications for resource protection. Some types of designations allow much more latitude in undertaking management activities and involve a lower degree of resource protection. The source of the special designation is also a relevant consideration; a designation established through an act of Congress clearly carries more weight than an administrative designation applied by a resource management agency.
- 2) Qualitative ratings of High, Moderate, and Low were used as proxy measures for the level of demand for a specific recreation opportunity.
- 3) Identification of characteristics that might be considered outstanding or unusual qualities for a given opportunity is a highly subjective task because of wide variation in values, tastes, and perceptions among the recreational public. The standard does not specify what qualities would define an opportunity as outstanding or unusual or indicate how those characteristics could be measured. Some sites or areas have attributes that qualify them as “unique” (i.e., one of a kind), while others have qualities that are not unique but intuitively set them apart from other opportunities and could be considered outstanding or unusual.
- 4) Qualitative ratings of Rare, Uncommon, and Common were used to address the criterion based on the rareness of an opportunity. Consideration of these rareness attributes was based on the approximate set of comparable opportunities (and the geographic scale appropriate to each type of opportunity) available within the general region surrounding the Project. Local parks are provided by several municipalities within the region, although

the City of Echo is the only local government providing opportunities within the Analysis Area.

- 5) Ratings of Irreplaceable, Somewhat Irreplaceable, and Replaceable were used to address the criterion based on the ability to replace an opportunity. In general, opportunities based on inherent natural resource characteristics that could not feasibly be recreated in the same place or at another location (such as physical, visible evidence of the Oregon Trail) can reasonably be considered Irreplaceable. By contrast, most opportunities that are based on constructed recreation facilities or infrastructure (such as typical campgrounds or municipal parks) could feasibly be replaced and were considered Replaceable.

The overall assessment of importance for each recreational opportunity identified was conducted on a case-by-case basis. For example, it is conceivable that a resource would have a special management designation and high use, but still be a common and replaceable opportunity without unique or outstanding qualities; in that instance, a determination that the opportunity was not important would be justifiable. Alternatively, an opportunity might have little or no management protection and low evident demand, but still be considered important because it was rare and/or irreplaceable. Table T-1 summarizes the importance assessment for all identified recreation resources in the Analysis Area.

Table T-1. Inventory of Recreational Resources in the Analysis Area

Recreational Opportunity	Responsible Entity	Distance from Site Boundary (miles)	Description	Size	Importance Factors					Important Recreation Resource?
					Special Designation or Management	Degree of Demand	Outstanding or Unusual Qualities	Availability or Rareness	Irreplaceability	
Oregon National Historic Trail Segments/Sites	NPS and OHTAC	NA	The Oregon Trail was one of the main overland migration routes on the North American continent, leading from locations on the Missouri River to the Oregon Country. No high-potential trail segments are located within the Analysis Area (NPS 1999).	Approx. 10 miles of designated ONHT route within Analysis Area; no high-potential trail segments or sites within Analysis Area	National Historic Trail	Low	Most trail segments destroyed by agricultural use; public access to areas of remaining trail evidence is generally limited to BLM-managed lands.	Intact evidence of trail route rare or uncommon, depending on location	Irreplaceable (intact segments only)	NA
Echo Hills Golf Club	City of Echo	3.2 miles	Public 9-hole golf course with pro shop, snack bar, driving range, and cart rentals.	Approximately 50 acres	municipal golf course	Low	Public golf course situated on rolling hills overlooking the Umatilla River Valley. Typical of golf courses in small, rural communities.	Common (one of several golf courses within the region)	Replaceable	No
Fort Henrietta Park	City of Echo	2.7 miles	Public park located on the Umatilla River. A replica blockhouse has been constructed at the site. The park includes a small recreational vehicle (RV) park and campground, a playground, and a skate park.	Approximately 2 acres	municipal park	Low	Public park with RV campground, public access to the Umatilla River, and interpretive panels. Site apparently is part of the ONHT Echo Complex high-potential site identified by the NPS (1999) because it was a campsite and river crossing for the Oregon Trail emigrants. No remnants of the Oregon Trail are located within the park.	Uncommon (one of few public access points along the Umatilla River in the region)	Replaceable park facilities; Irreplaceable connection to ONHT crossing site	No
F.T. George Park	City of Echo	2.8 miles	Small, formal municipal park located behind city hall. The landscaped park includes a gazebo, rose garden, pond and waterfall, and picnic facilities. It is available for rental and is the site of many community events.	Less than 1 acre	municipal park	Low or Moderate	Notable for community event use and diversity of landscaping.	Common	Replaceable	No
Oregon Trail Arboretum	City of Echo	3.1 miles	Small city block with approximately 100 ornamental trees and shrubs.	Less than 1 acre	municipal park property	Low	Interpretive panels with tree and shrub names.	Uncommon resource for a small city	Replaceable	No
Horseshoe Curve Hunt Club	Private	0.2 mile	Fee hunting on private land for deer, upland birds, and waterfowl. use by reservation only, for a limited number of guests per day.	Approx. 650 acres total, all located in Analysis Area	None	Low-moderate	Game birds raised on site for reliable hunting; hunting terrain situated in restored grasslands and agricultural fields; limited availability for use.	Private hunting areas are Common in general; resource is Uncommon in that it is one of a few private hunting grounds in the region with stocked game birds.	Replaceable	No
Corral Springs Oregon National Historic Trail Site	Private	0.4 mile	A portion of a private property to which the landowner has allowed public access to view Oregon Trail ruts; interpretive panel and space for parking vehicles	Approx. 5 acres	None	Low	Views of 0.25 mile of intact wagon ruts from site adjacent to local road. Continued public access to the site subject to the discretion of the landowner.	Uncommon (one of several sites in the region with intact evidence of trail route)	Irreplaceable	No

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2.3.2 Resource Descriptions and Importance Assessment

Based on the importance criteria described above and summarized in Table T-1, none of the six identified recreation resources within the Analysis Area have been determined to be important for the purposes of this application. The approach and results for the importance assessment are summarized below.

2.3.2.1 Echo Hills Golf Club

The 9-hole Echo Hills Golf Club is a public, municipal course located on the eastern edge of the community of Echo (City of Echo 2018). The level of demand is assumed to be low, because the local population is small and the course is not near larger population centers. The course is rated as of average difficulty, and available information about the course does not reference outstanding or unusual qualities. Although there are no other public golf courses within the Analysis Area, the surrounding region includes golf courses within multiple communities such as Pendleton, Boardman, Umatilla, and Heppner. Therefore, this resource is considered common, and it is replaceable. Based on consideration of the attributes relative to the defined set of importance criteria, the Echo Hills Golf Club is not considered to meet the criteria for an important recreation resource.

2.3.2.2 Fort Henrietta Park

Fort Henrietta Park is a small facility located within a developed community, and it is typical in many respects of other small, municipal parks that serve a local population. The park does have some unusual qualities, including location on and access to the Umatilla River, location at a noted ONHT campsite and river crossing, a replica of a frontier-era blockhouse, and the inclusion of camping within the park (City of Echo 2018). Based on the historic interest and the mix of individual opportunities, specifically including the river access, the park is considered an uncommon resource. The level of demand is assumed to be low, because the local population is small, the facility capacity is small, and the park is not located on a high-volume travel route. The resources and characteristics of the park are generally replaceable, except for the historical link to the ONHT crossing. Primarily because the park has low demand and is replaceable, Fort Henrietta Park is not considered to meet the criteria for an important recreation resource.

2.3.2.3 F.T. George Park

F. T. George Park (often referred to as George Park) is also a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (City of Echo 2018). The park does have some characteristics that are notable but not outstanding, including its use for community events and the apparent quality of the landscaping. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small, although use for community events may raise the demand level to moderate. The park is considered a common resource, and it is replaceable. Based on the demand

and replaceability factors and the lack of outstanding characteristics, George Park is not considered to meet the criteria for an important recreation resource.

2.3.2.4 Oregon Trail Arboretum

The Oregon Trail Arboretum is a small property located near the eastern edge of Echo that contains a diverse collection of ornamental trees and shrubs (City of Echo 2018). The arboretum is considered an uncommon resource for a small community the size of Echo. The level of demand is assumed to be low, because the local population is small and the arboretum is not located in an area of high tourism activity. The resource is replaceable. Despite the name, the arboretum has no connection to the Oregon Trail other than proximity to the ONHT route. Based on the demand and replaceability factors and the lack of outstanding characteristics, the Oregon Trail Arboretum is not considered to meet the criteria for an important recreation resource.

2.3.2.5 Horseshoe Curve Hunt Club

The Horseshoe Curve Hunt Club (2018) is a privately-owned property operated on a commercial basis for hunting and associated lodging. The resource has no special designation, has a relatively small capacity, and is replaceable. Private hunting areas appear to be relatively common within the region, although providing stocked upland game birds is not typical. Overall, the club is not considered to meet the OAR 345-022-0100 definition of an important recreational opportunity.

2.3.2.6 Corral Springs ONHT Site

This site for public viewing of Oregon Trail ruts consists of a portion of a private property to which the landowner has allowed limited public access (City of Echo 2018). The resource has no special designation, as it is not on public lands and is not identified as a high-potential ONHT site. Demand is assumed to be low because the site has a small capacity and it is not located on a high-volume travel route. Although much of the physical evidence of the ONHT has disappeared over time, the Corral Springs site is not rare within the region because there are multiple other locations in the vicinity (such as Echo Meadows, Well Spring, and Fourmile Canyon) with Oregon Trail ruts, interpretive information, and defined public access. Continued public use of this site appears to be somewhat uncertain, because permission for public use can be revoked at any time by the landowner. Although the site is not replaceable because visible Oregon Trail ruts are present, attributes for the remaining importance factors indicate that the Corral Springs site does not meet the criteria for an important recreation resource.

3.0 Impact Assessment – OAR 345-021-0010(1)(t)(B)

OAR 345-021-0010(1)(t)(B) A description of any significant potential adverse impacts to the important opportunities identified in (A) including, but not limited to:

- (i) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation;*
- (ii) Noise resulting from facility construction or operation;*
- (iii) Increased traffic resulting from facility construction or operation;*
- (iv) Visual impacts of facility structures or plumes;*

Nolin Hills Wind, LLC (the Applicant) assessed recreational opportunities within the Analysis Area to determine whether any of the inventoried resources met the criteria for identification as important recreational resources. As documented in Section 2.3, Nolin Hills concluded that none of the inventoried resources should be classified as important recreational opportunities. Because the requirement to describe significant potential adverse impacts stated at OAR 345-021-0010(1)(t)(B) applies specifically to important recreational opportunities, there is no need for Nolin Hills to determine whether the Project’s design, construction, and operation, taking into account mitigation, would be likely to result in any significant adverse impacts.

4.0 Mitigation – OAR 345-021-0010(1)(t)(C)

OAR 345-021-0010(1)(t)(C) A description of any measures the applicant proposes to avoid, reduce or otherwise mitigate the significant adverse impacts identified in (B);

As described Section 3, there are no important recreational opportunities in the Analysis Area and the Project will have no significant, direct adverse impact on any important recreational opportunity. Consequently, no mitigation measures are proposed.

5.0 Map – OAR 345-021-0010(1)(t)(D)

OAR 345-021-0010(1)(t)(D)(D) A map of the analysis area showing the locations of important recreational opportunities identified in (A);

Figure T-1 provides a map of the analysis area showing locations of recreational opportunities. None of the identified recreational opportunities meet the criteria for importance under the standard.

6.0 Monitoring of Impacts – OAR 345-021-0010(1)(t)(E)

OAR 345-021-0010(1)(t)(E) The applicant's proposed monitoring program, if any, for impacts to important recreational opportunities.

Because construction and operation of the proposed Project would have no significant adverse impacts on recreational opportunities in the Analysis Area, and no mitigation specific to recreation is warranted or proposed, no monitoring program for recreation is proposed.

7.0 Conclusion

The information provided above demonstrates that the design, construction, and operation of the Project will not result in significant adverse impacts to recreational opportunities and therefore complies with the recreational standard under OAR 345-022-0100.

8.0 References

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





Figure

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Nolin Hills Wind Power Project

**Figure T-1
Recreational Opportunities
in the Analysis Area**

UMATILLA COUNTY, OREGON


-  Proposed Site Boundary
-  Analysis Area (5-mile buffer)
-  Horseshoe Curve Hunt Club
-  Oregon Trail Site
-  Golf Course
-  City, County and State Parks
-  Bureau of Land Management
-  City/Town
-  Interstate Highway
-  Secondary Highway
-  State Boundary
-  County Boundary

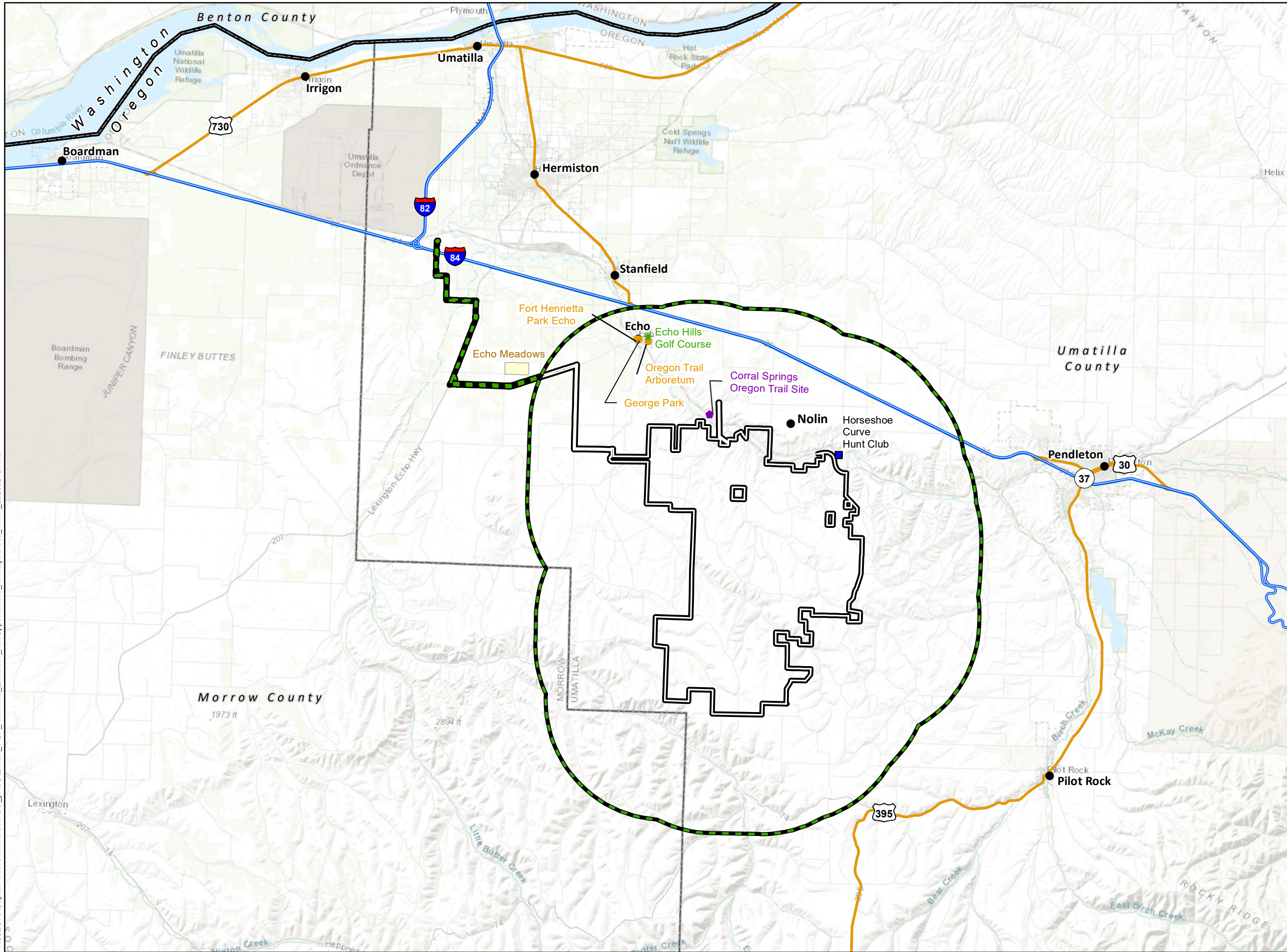


TETRA TECH



Capital Power
RESPONSIBLE ENERGY FOR TOMORROW

Data Sources	Reference Map
Capital Power-Project Infrastructure; ESRI-Aerial Imagery; ESRI-Roads; ESRI-State, County boundaries	



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