Scenic Resources Exhibit

Cascade Renewable Transmission

Wasco, Hood River, and Multnomah Counties, Oregon

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Oregon Energy Facility Siting Council

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Acronyms and Abbreviations

Applicant	Cascade Renewable Transmission, LLC (CRT)
BLM	U.S. Department of the Interior, Bureau of Land Management
CRGNSA	Columbia River Gorge National Scenic Area
HVAC	high-voltage alternating current
NPS	National Park Service
OAR	Oregon Administrative Rules
ODFW	Oregon Department of Fish and Wildlife
OPRD	Oregon Parks and Recreation Department
Project	Cascade Renewable Transmission Project
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
WDFW	Washington Department of Fish and Wildlife

1 Introduction

The Cascade Renewable Transmission Project's (Project) above ground infrastructure includes the construction of two converter stations, one at the east end near the Big Eddy substation in The Dalles, Oregon, and one near the western end in northwest Portland that will connect to the Harborton substation. The converter stations will be connected by in-river and upland 400-kilovolt (kV) (1,100-megawatt [MW]) underground high-voltage direct current (HVDC) cable segments. The eastern converter station near The Dalles would be connected to the existing Big Eddy substation with approximately 500 feet of 500kV overhead high-voltage alternating current (HVAC) wire, which would be supported by two new lattice structures approximately 80 feet wide and 60 feet tall. One lattice structure would be located in the Big Eddy substation and one lattice structure would be within the eastern converter station; however, the lattice structure associated with the Big Eddy substation would not be part of the transmission facility.

This exhibit analyzes the proposed Project impacts to scenic resources, as required to comply with OAR 345-022-0080:

OAR 345-022-0080 Scenic Resources

(1) 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 visual impacts to significant or important scenic resources.

(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). In issuing such a site certificate, the Council may impose conditions of approval to minimize the potential significant adverse visual impacts from the design, construction, and operation of the facility on significant or important scenic resources.

(3) A scenic resource is considered to be significant or important if it is identified as significant or important in a current land use management plan adopted by one or more local, tribal, state, regional, or federal government or agency.

(4) The Council shall apply the version of this rule adopted under Administrative Order EFSC 1-2007, filed and effective May 15, 2007, to the review of any Application for Site Certificate or Request for Amendment that was determined to be complete under OAR 345-015-0190 or 345-027-0363 before the effective date of this rule. Nothing in this section waives the obligations of the certificate holder and Council to abide by local ordinances, state law, and other rules of the Council for the construction and operation of energy facilities in effect on the date the site certificate or amended site certificate is executed.

RESPONSE

2 Analysis Area

The analysis area is shown in Figure 1 (Section 10). In accordance with OAR 345-022-0080 and pursuant to the Project Order, the analysis area for scenic resources includes the area within the site boundary and the area within 10 miles of aboveground portions of the Project. The portion of the Project within the site boundary but outside the 10-mile aboveground buffers would be entirely

beneath the Columbia River and would not intersect with any scenic resources. Therefore, the analysis focuses on the area within the 10-mile buffers, shown in Figure 1.

Some identified scenic resources are located partially or entirely within the State of Washington. Although the Cascade Renewable Transmission, LLC (CRT; the Applicant) has undertaken studies of potential impacts to all scenic resources within the analysis area under OAR 345-022-0080(5)(b), the Applicant reserves the right to take the position that applicable Oregon law does not require analysis of scenic resources outside of Oregon.

The analysis area includes parts of five Oregon municipalities, five Oregon counties, one Washington municipality, two Washington counties, and land administered by the Oregon Department of Fish and Wildlife (ODFW), Oregon Parks and Recreation Department (OPRD), Washington Department of Fish and Wildlife (WDFW), Washington State Parks and Recreation Commission, Columbia River Gorge National Scenic Area (CRGNSA), U.S. Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (USFWS), National Park Service (NPS), and U.S. Army Corps of Engineers (USACE).

3 Identification of Significant or Important Scenic Resources (OAR 345-022-0080(5)(a)(b))

OAR 345-022-0080(5) To assist the Council in determining whether the standard outlined in (1) through (4) has been met, the Applicant must submit an analysis of potential visual impacts of the proposed facility, if any, on significant or important scenic resources within the analysis area, providing evidence to support a finding by the Council as required by OAR 345-022-0080, including:

(a) An inventory of scenic resources identified as significant or important in a land use management plan adopted by one or more local, tribal, state, regional, or federal government or agency applicable to lands within the analysis area for scenic resources. The applicant must provide a list of the land management plans reviewed in developing the inventory and a copy of the relevant portion of the plans;

(b) A map or maps showing the location of the scenic resources described under paragraph (a), in relation to the site of the proposed facility;

RESPONSE

Pursuant to the Project Order, scenic resources considered in this exhibit are those “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…For the purposes of the exhibit, ‘local’ land use plans include state, county, and city planning documents or inventories.”

The following sections inventory scenic resources within the analysis area that have been identified as significant or important by applicable land use plans. Figures 2A and 2B (Section 10) show the location of significant scenic resources in relation to the proposed facility.

3.1 Municipalities

Table 1. Significant Scenic Resources – Municipalities

Jurisdiction	Plan/Code/Ordinance	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resource in Analysis Area (Y/N)	Name of Important or Significant Scenic Resource(s) in Analysis Area	Location Scenic Resources Discussed in Plan
Beaverton, OR	*Beaverton Comprehensive Plan* (City of Beaverton 2022) and *Development Code*	Y	N	N/A	*Comprehensive Plan* Chapter 7.4; Goal 7.4.1 Policy (b) in *Development Code*
Hillsboro, OR	*Hillsboro Comprehensive Plan* (City of Hillsboro 2024); *Hillsboro 2035 Community Plan* (City of Hillsboro 2020); *Hillsboro Development and Municipal Code*	N	N	N/A	N/A
Portland, OR	*City of Portland Comprehensive Plan* (City of Portland 2023); *Central City Scenic Resources Protection Plan Inventory (CCSRI)* (City of Portland 2020a); *Scenic Views, Sites and Drives Inventory* (City of Portland 1988); *Willamette River Greenway Inventory* (Portland Bureau of Planning and Sustainability 2020); *Portland City Code Title 33.480 - Scenic Resource Zone; Scenic Resources Protection Plan* (City of Portland, 1991)	Y	Y	Scenic Resource Zone Scenic Resources in Urban Services Boundary Central City skyline, and Central City Scenic Resources Willamette River (n), (g) and (r) Greenway Overlay Zones	*Comprehensive Plan* Policy 4.41 to 4.45; Chapter 3 to 7 of *CCSRI;* Viewpoints in Map 480-1 in *Scenic Views, Sites and Drives Inventory* Map 3 (pages 18-19) of *Willamette River Greenway Inventory*
Scappoose, OR	*City of Scappoose Comprehensive Plan* (City of Scappoose 2018); *Scappoose Municipal Code*; *City of Scappoose Parks, Trails and Open Space Master Plan* (City of Scappoose 2024)	Y	N	N/A	*City of Scappoose Comprehensive Plan* goal 5(b) (page 99); *City of Scappoose Parks Master Plan* (page 47)

Jurisdiction	Plan/Code/Ordinance	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resource in Analysis Area (Y/N)	Name of Important or Significant Scenic Resource(s) in Analysis Area	Location Scenic Resources Discussed in Plan
The Dalles, OR	*The Dalles, Oregon Comprehensive Land Use Plan* (City of The Dalles 2024); *The Dalles Growth Management Report* (Winterbrook Planning 2013); *2011 Scenic Evaluation Report* (EcoTrust 2011).	Y	Y	Columbia River Gorge National Scenic Area	*The Dalles, Oregon Comprehensive Land Use Plan,* goal #1 and #5 *The Dalles Growth Management Report* (page 4 to 5); *2011 Scenic Evaluation Report* Page 4
Vancouver, WA	*Vancouver Comprehensive Plan 2011-2030* (City of Vancouver 2021)*;* and *Vancouver Municipal Code*	Y	Y	Evergreen Way, Columbia River	*Vancouver Municipal Code (VMC)* 11.80.040(B)(5)(e) and *VMC* 20.430.020(E)
Clackamas, Multnomah and Washington counties, OR	*Oregon Metro Regional Framework Plan*	N	N	N/A	N/A

3.1.1 Beaverton, Oregon

Chapter 7.4 in Volume I of the Beaverton *Comprehensive Plan* (City of Beaverton 2022) addresses Scenic Views and Sites within the context of Statewide Planning Goal 5, and identifies Mount Hood as a scenic resource. Mount Hood is not located within the analysis area. The chapter also states that the "City of Beaverton has chosen not to regulate conservation of scenic views of surrounding mountains, including Mount Hood, although such scenic views may be present in the city" (City of Beaverton 2022).

Beaverton Development Code does not specify any scenic resources.

For the purposes of this analysis, the Applicant concludes that Beaverton, Oregon has not identified any significant scenic resources in the analysis area.

3.1.2 Hillsboro, Oregon

The *Hillsboro Comprehensive Plan* (City of Hillsboro 2024), *Hillsboro 2035 Community Plan* (City of Hillsboro 2020), and *Hillsboro Development and Municipal Codes* do not specify any scenic resources. For the purposes of this analysis, the Applicant concludes that Hillsboro, Oregon has not identified any significant scenic resources in the analysis area.

3.1.3 Portland, Oregon

Title 33 of the Portland city code (33.480), designates a Scenic Resource Zone[1], which applies to "significant view corridors, viewpoints, and scenic corridors." The Scenic Resource zone is shown on official zoning maps with a lowercase "s" symbol. Scenic resources from the Scenic Resource Zone and in the analysis area includes Multnomah Channel, Willamette River, Public Roads on Sauvie Island, and US 30 Highway. Portland's Scenic Resource Zone is also referenced in the *Scenic Resources Protection Plan* (City of Portland 1991). The Scenic Resource Zone is shown in Figure 2A (Section 10).

Scenic Views, Sites and Drives Inventory (City of Portland 1988) is an inventory of scenic resources developed as part of the periodic review of the Portland Comprehensive Plan; and complies with Oregon's requirements for scenic resource protection (Statewide Planning Goal 5). The plan provides scenic resources based on six categories: panoramas, views of the city, views of mountains, views of bridges, scenic sites and scenic drives within the Portland Urban Services Boundary. Portland's Urban Service Boundary is shown in Figure 2A (Section 10).

Portland's *2035 Comprehensive Plan* (City of Portland 2023) has a "Scenic Resources" section which describes that Portland's "signature views" include Mount Hood and the Central City skyline. A boundary of Portland's Central City Scenic Resources within the analysis area includes the Central City skyline and is shown in Figure 2A (Section 10). Mount Hood is not within the analysis area.

The *Central City Scenic Resources Protection Plan Inventory* (City of Portland 2020a) was developed according to Ordinance No. 190023; along with Goal 5, Goal 8 and Goal 15 of Oregon State Land Use Goals. The plan includes an inventory of scenic resources within the Central City

[1] Portland City Code, Title 33 Planning and Zone, 33.480 Scenic Resource Zone: https://www.portland.gov/sites/default/files/code/480-scenic.pdf

boundary of Portland, subdivided into five quadrants: Northwest, North, Northeast, Southwest, Southeast. Four quadrants are within the analysis area, except the southwest quadrant which partially overlaps with the analysis area. The inventory identified 157 views from 148 viewpoints, 27 view streets, six scenic corridors, 25 visual focal points and five scenic sites. A boundary of Portland's Central City Scenic Resources from the inventory is shown in Figure 2A (Section 10).

The *Willamette River Greenway Inventory* (Portland Bureau of Planning and Sustainability 2020) identifies scenic viewpoints, and outlines boundaries of the scenic, greenway, or river overlay zones. Scenic resources overlapping with the River Natural (n), River General (g) or River Recreational (r) overlay zones are considered significant due to their inclusion in the Goal 15 inventory to conserve the Willamette River. (n) zones include areas that protects, conserves and enhances land of scenic quality or of significant importance as wildlife habitat. (g) zones allow for protection of public use and enjoyment of the waterfront, and enhancement of the river's natural and scenic qualities. (r) zones encourages river-dependent and river-related recreational uses that provide a variety of public access opportunities to and along the river and enhances the river's natural scenic qualities. The Willamette River (n), (g), and (r) zones are in the analysis area and shown in Figure 2A (Section 10).

3.1.4 Scappoose, Oregon

Both the *Scappoose Comprehensive Plan* (City of Scappoose 2018) and *Scappoose Parks, Trails, and Open Space Plan* (City of Scappoose 2024) plans do not identify specific scenic resources as "significant" or "important," however, both plans acknowledges the scenic views of Mt. St. Helens, Mt. Adams, and Mt. Hood. These three mountains are not within the analysis area.

Scappoose Municipal Code does not specify any scenic resources.

For the purposes of this analysis, the Applicant concludes that Scappoose, Oregon has not identified any significant scenic resources in the analysis area.

3.1.5 The Dalles, Oregon

The Dalles, Oregon Comprehensive Land Use Plan (City of The Dalles 2024) states in Goal 1 that The Dalles is within the Columbia River Gorge National Scenic Area (CRGNSA), and the city's planned urban growth boundary (UGB) expansion must comply with the National Scenic Area Act (NSAA). Other reports related to the UGB expansion in The Dalles also cites the CRGNSA as a significant scenic resource, including *The Dalles Growth Management Report* (Winterbrook Planning 2013) and the *2011 Scenic Resources Evaluation Report* (EcoTrust 2011). The CRGNSA boundary is within the analysis area and shown in Figure 2B (Section 10).

3.1.6 Vancouver, Washington

The *Vancouver Comprehensive Plan 2011-2030* (City of Vancouver 2021) does not mention significant scenic resources.

Vancouver Municipal Code (VMC) 11.80.040(B)(5)(e) identifies a City of Vancouver designated scenic route. The scenic route is Evergreen Street, also known as Officers' Row, between Ft. Vancouver Way and East Reserve S. This street is within the analysis area. The Evergreen Street/Officers' Row is shown in Figure 2A (Section 10).

VMC 20.430.020(E) lists the Waterfront Mixed-Use (WX) zoning district as “designed to provide for a significant level of mixed-use development and pedestrian access along the Columbia River while maintaining environmental and scenic resources and compatibility of uses.” Columbia River is inferred as a significant scenic resource because it is regulated by the WX zoning district in the City of Vancouver. Columbia River is within the analysis area and shown in the basemap of Figure 2A (Section 10).

3.1.7 Clackamas, Multnomah and Washington counties, Oregon

The *Oregon Metro Regional Framework Plan* (Oregon Metro 2014) does not mention scenic resources. For the purposes of this analysis, the Applicant concludes that Oregon Metro has not identified any significant scenic resources in the analysis area.

3.2 Counties

Table 2. Significant Scenic Resources – Counties

Jurisdiction	Plan	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resource in Analysis Area (Y/N)	Name of Important or Significant Scenic Resource(s) in Analysis Area	Location Scenic Resources Discussed in Plan
Columbia County, OR	*Columbia County Comprehensive Plan* (Columbia County 2023); *Columbia County Zoning Ordinance*	Y	Y	Willamette River	*Columbia County Comprehensive Plan* Part XVI, Goal 5, Article XIII Scenic Resources (pages 287-288) *Columbia County Zoning Ordinance* Section 1141 (page 226)
Multnomah County, OR	*Multnomah County Comprehensive Plan* (Multnomah County 2016); *Multnomah County Code*; *Inventory of Natural, Scenic and Open Space Resources for Multnomah County Unincorporated Urban Areas Report* (City of Portland (Adopted by Multnomah County), 2022)	Y	Y	Columbia River Gorge National Scenic Area; Multnomah County viewing areas: Bybee-Howell House; Virginia Lakes; Sauvie Island Wildlife Refuge; Kelley Point Park; and Smith and Bybee Lakes, Highway 30, Multnomah Channel, The Willamette River, Public roads on Sauvie Island; Willamette River Scenic Waterway, Tualatin Mountains, Forest Park, Fred's Marina	*Multnomah County Zoning Code* Chapter 38 (Columbia River Gorge National Scenic Area); *Multnomah County Zoning Code* Chapter 39.5650(A)(2); *Multnomah County Comprehensive Plan* Page 5-11 and Figure 5-7; *Inventory of Natural, Scenic and Open Space Resources for Multnomah County Unincorporated Urban Areas Report* Page 19
Sherman County, OR	Sherman County *Comprehensive Land Use Plan* (Sherman County 2007); *Sherman County Zoning Ordinance*	Y	Y	The Deschutes River Canyon	*Comprehensive Land Use Plan* Section XI Finding XI (page 18)

Jurisdiction	Plan	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resource in Analysis Area (Y/N)	Name of Important or Significant Scenic Resource(s) in Analysis Area	Location Scenic Resources Discussed in Plan
Wasco County, OR	*Wasco County Comprehensive Plan* (Wasco County 2010); *Wasco County Zoning Code*; Wasco County National Scenic Area Land Use (NSA) Ordinance	Y	Y	The Columbia River Gorge The Deschutes River Historic Columbia River Highway, I-84 (Columbia River Gorge National Scenic Area)	*Wasco County Comprehensive Plan* Table 11 - Outstanding Scenic & Recreational Areas in Wasco County (page 5-19); Chapter 14 (page 14-10); and Chapter 15 Goal #5 (page 15-15 and 15-16) *Wasco County Code* Section 3.180 – "OS" – Open Space
Washington County, OR	*Washington County Comprehensive Plan* (Washington County 2024a); *Community Plans* (Washington County 2024b); *Transportation System Plan* (Washington County, 2024c), *Washington County Community Development Code*	Y	Y	Elk Point Vista, Swede Hill Vista	*Washington County Comprehensive Plan* Policy 12 (page 43)
Clark County, WA	Clark County *20-Year Comprehensive Growth Management Plan 2015-2035* (Clark County 2022)*; Clark County Unified Development Code*	Y	Y	Columbia River Gorge National Scenic Area	*20-Year Comprehensive Growth Management Plan 2015-2035* Page 110 – Environmental Element; *Clark County Unified Development Code* Title 40 - Chapter 40.240
Klickitat County, WA	Klickitat County *Comprehensive Plan* (Klickitat County 2013); *Klickitat County Code*	Y	Y	Columbia River Gorge National Scenic Area	*Comprehensive Plan* (Title 19) Page 78

3.2.1 Columbia County, Oregon

The *Columbia County Comprehensive Plan* (Columbia County 2023) identifies five scenic resources, two scenic highways, and two scenic views. None of these scenic resources are in the analysis area.

Section 1141 of the Columbia County Zoning Ordinance outlines regulations, restrictions and conditions to implement the Willamette River Greenway Land Use Designation (Greenway) in the Comprehensive Plan. The ordinance is intended to "protect… scenic qualities of lands along the Willamette River… and development of lands within the Greenway". Willamette River is located within the analysis area and shown in Figure 2A (Section 10).

3.2.2 Multnomah County, Oregon

Chapter 38 of the *Multnomah County Zoning Code* is dedicated to protecting and enhancing the scenic resources of the Columbia River Gorge as designated by the Columbia River Gorge National Scenic Area Act. Portions of Chapter 39, Multnomah County Zoning Code, also sets regulations to protect the Columbia River Gorge National Scenic Area (CRGNSA). CRGNSA is within the analysis area and identified in Figure 2B (Section 10).

The *Multnomah County Comprehensive Plan* (Multnomah County 2016) identifies "scenic views of the West Hills[2] from a number of *specific viewing areas*" as "significant." Nine "identified viewing areas" that "provide important views of a significant scenic resource" are listed in Multnomah County Zoning Code section 39.5650(A)(2)[3].

The nine "identified viewing areas," shown in Figure 2A (Section 10), are all at least partially in the analysis area.

- Five are entirely within the analysis area: Bybee-Howell House, Virginia Lakes, Sauvie Island Wildlife Refuge, Kelley Point Park, Smith and Bybee Lakes
- Four are partially within the analysis area: Highway 30, The Multnomah Channel, The Willamette River, Public roads on Sauvie Island.

The *Inventory of Natural, Scenic and Open Space Resources for Multnomah County Unincorporated Urban Areas Report* (City of Portland 2022) identifies scenic resource inventory site location Linnton, which is located within unincorporated Multnomah County, and in the analysis area. In Linnton, scenic resources include the Willamette River Scenic Waterway, the east face of Tualatin Mountains, Forest Park, and Fred's Marina. These scenic resources are shown in Figure 2A under "Multnomah County Scenic Resources" (Section 10).

3.2.3 Sherman County, Oregon

Sherman County Comprehensive Land Use Plan (Sherman County 2007) lists the following as important scenic features of Sherman County's landscape: "rock outcroppings, trees, the John Day River Canyon, and the Deschutes River Canyon". The Lower Deschutes River is partially within the

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[2] The West Hills area is shown in Figure 5-7 Scenic Areas in the Comprehensive Plan as well as the County's https://multco.maps.arcgis.com/apps/webappviewer/index.html?id=9c6906dd2ff1459b9d6c7d0a0de4afb2.

[3] Multnomah County Zone Code 39.5650 Criteria for Approval of Sec-V Permit – Significant Scenic Views: https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/ch39.pdf

analysis area and shown in Figure 2B (Section 10). John Day River Canyon is not within the analysis area.

Sherman County Zoning Ordinance provides regulations for development and the protection of scenic resources but does not specify any significant scenic resources.

3.2.4 Wasco County, Oregon

Wasco County Comprehensive Plan (Wasco County 2010) identifies six "Outstanding Scenic & Recreational Areas," including two in the analysis area: The CRGNSA and the Deschutes River, which are both shown in Figure 2B (Section 10).

Wasco County Zoning Code provides regulations to protect scenic resources. In Section 3.180 of the *Wasco County Zoning Code*, the "OS" Open Space Zone specifies that design and development of transportation or utility projects are required to protect scenic resources; and would need to be consistent with Historic Columbia River Highway Master Plan developed for the Historic Columbia River Highway and the scenic highway corridor strategy for I-84. Both I-84 and portions of the Historic Columbia River Highway are within the analysis area and shown in Figure 2B (Section 10).

3.2.5 Washington County, Oregon

The *Washington County Comprehensive Plan* states that the County will identify outstanding scenic resources through community plans (Washington County 2024a). Two of the community plans located within the analysis area identified scenic resources: (1) The Aloha-Reedville-Cooper Mountain Community Plan, which outlines policies to protect scenic views of Cooper Mountain, and (2) the Cedar Hills-Cedar Mill Community Plan which outlines design regulations to preserve Elk Point and Swede Hill Vistas (Washington County 2024b). Cooper Mountain is not within the analysis area. However, both Elk Point and Swede Hill Vistas are within the analysis area and shown in "Washington County Significant Scenic Resources" in Figure 2A (Section 10).

The Washington County *Transportation System Plan* (Washington County 2024c) Bicycle Element recognizes the Tualatin Valley Scenic Bikeway as a significant scenic resource; however, this bicycle route is not within the analysis area.

The *Community Development Code* for the County has policies to protect scenic resources as part of development, however, no specific scenic resources are mentioned.

3.2.6 Clark County, Washington

The Clark County *20-Year Comprehensive Growth Management Plan 2015-2035* (Clark County 2022) mentions the CRGNSA as a scenic area. Additionally, *Clark County Unified Development Code* (Title 40), specifically, Chapter 40.240 (Columbia River Gorge National Scenic Area Districts) consists of regulations and zoning designations to protect CRGNSA. CRGNSA is shown in Figure 2B (Section 10).

3.2.7 Klickitat County, Washington

The *Klickitat County Comprehensive Plan* (Klickitat County 2013) mentions the CRGNSA as a scenic resource. The CRGNSA is shown in Figure 2B (Section 10).

3.3 State

Table 3. Significant Scenic Resources – State

Jurisdiction	Plan/Code/Ordinance	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resource in Analysis Area (Y/N)	Name of Important or Significant Scenic Resource(s) in Analysis Area	Location Scenic Resources Discussed in Plan
Oregon State Legislature	*Oregon Revised Statues (ORS)* Volume 10, Chapter 390 - State and Local Parks; Recreation Programs; Scenic Waterways; Recreation Trails	Y	Y	Deschutes Scenic Waterway	ORS 390.826
Oregon Department of Fish and Wildlife (ODFW)	*Lower Deschutes Wildlife Area Management Plan* (ODFW 2021); *Sauvie Island Wildlife Area Management Plan* (ODFW 2012)	Y	Y	Lower Deschutes Wild and Scenic River	*Lower Deschutes Wildlife Area Management Plan* Page 5
Oregon Parks and Recreation – Mayer State Park	*Oregon Parks and Recreation – State Scenic Waterways Program; Oregon Natural Areas Plan* (OPRD, 2015a); *Columbia River Gorge Management Units Plan* (OPRD, 2015b)	Y	Y	Lower Deschutes Wild and Scenic River Columbia River Gorge National Scenic Area Mayer State Park	*Columbia River Gorge Management Units Plan* Page 19-20
Washington Department of Fish and Wildlife (WDFW)	*Klickitat Wildlife Area Management Plan* (WDFW 2016) and *Shillapoo Wildlife Area Management Plan* (WDFW 2006)	N	N	N/A	N/A
Washington Parks and Recreation Department	*Washington State Parks Strategic Plan* (Washington State Parks and Recreation Commission 2020)	N	N	N/A	N/A

3.3.1 Oregon State Legislature

Oregon Revised Statues (ORS) dedicates Chapter 390.826 to a list of designated scenic waterways in Oregon. Deschutes River is on the list of designated scenic waterways. Lower Deschutes Wild and Scenic River, which is part of the Deschutes River, is within the analysis area. The Lower Deschutes Wild and Scenic River is shown in Figure 2B (Section 10).

3.3.2 Oregon Department of Fish and Wildlife (ODFW)

There are two state wildlife areas within the analysis area: the Lower Deschutes Wildlife Area and Sauvie Island Wildlife Area. ODFW manages these wildlife areas though the *Lower Deschutes Wildlife Area Management Plan* (ODFW 2021) and the *Sauvie Island Wildlife Area Management Plan* (ODFW 2012), respectively. The *Sauvie Island Wildlife Area Management* does not mention any scenic resources. The *Lower Deschutes Wildlife Area Management Plan* notes that the Lower Deschutes River is a State Scenic Waterway but does not identify any other scenic resources. The Lower Deschutes Wild and Scenic River is shown in Figure 2B (Section 10).

3.3.3 Oregon Parks and Recreation Department

The OPRD administers the state's Scenic Waterways Program. The Deschutes River Scenic Waterway is within the analysis area. Per Oregon Revised Statute (ORS) 736-040-0070(4)(a), the waterway has "outstanding scenic beauty and natural features." The Lower Deschutes River State Scenic Waterway is shown in Figure 2B (Section 10).

The 2015 *Oregon Natural Areas Plan* developed lists of ecological, geological and species elements and their corresponding natural areas (OPRD 2015a). However, there is no clear indication in the plan that these natural areas are also scenic resources.

The *Columbia River Gorge Management Units Plan* (OPRD 2015b) includes the Columbia River Gorge National Scenic Area and Mayer State Park as scenic resources. The CRGNSA boundary and Mayer State Park are in the analysis area. The CRGNSA boundary is shown on Figure 2B (Section 10); and Mayer State Park is shown in Figure 3 in the Protected Areas Exhibit of this application.

3.3.4 Washington Department of Fish and Wildlife (WDFW)

There are two state wildlife areas within the analysis area: the Swale Creek Wildlife Area and Shillapoo Wildlife Area. WDFW manages these wildlife areas through the *Klickitat Wildlife Area Management Plan* (WDFW 2016) and *Shillapoo Wildlife Area Management Plan* (WDFW 2006), respectively. These plans do not identify any specific scenic resources.

3.3.5 Washington State Parks and Recreation Commission

There are three Washington State Parks and Recreation Commission properties in the analysis area: Columbia Hills State Park, Doug's Beach State Park, and Klickitat State Park Trail. There are no publicly available management plans for these individual parks. The *Washington State Parks Strategic Plan 2021-2031* (Washington State Parks and Recreation Commission 2020) does not mention any scenic resources.

3.4 Tribal Land Management Plans

Tribal lands within the analysis area include the following:

- **Celilo Village, Oregon***:* Celilo Village is a tribal village[4] for members of the four Columbia River Treaty Tribes (The Confederated Tribes and Bands of the Yakama Nation; the Confederated Tribes of the Warm Springs Reservation; the Confederated Tribes of the Umatilla Indian Reservation; and the Nez Perce Tribe).
- **Off-reservation Trust Lands***:* In the analysis area, there are Off-Reservation Trust Lands for two tribes – the Confederated Tribes and Bands of the Yakama Nation and the Confederated Tribes of the Warm Springs Reservation.

The Tribal lands within the analysis area do not have publicly available land management plans that identify scenic resources. Therefore, this exhibit does not address scenic resources for tribal lands.

The *Columbia River Gorge National Scenic Area (CRGNSA) Management Plan* (Gorge Commission 2020), addressed in Section 3.5, involves collaboration with the four Columbia River Treaty Tribes.

See the Historic, Cultural and Archaeological Resources Exhibit for information regarding historic, cultural, and archaeological resources.

[4] U.S. Army Corps of Engineers, The Dalles Lock & Dam Tribal Housing Village Development Plan: https://www.nwp.usace.army.mil/tribal/villages/the-dalles/

3.5 Federal Land Management Plans

Table 4. Significant Scenic Resources – Federal

Jurisdiction	Plan	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resource in Analysis Area (Y/N)	Name of Important or Significant Scenic Resource(s) in Analysis Area	Location Scenic Resources Discussed in Plan
Columbia River Gorge National Scenic Area (CRGNSA)	*Columbia River Gorge National Scenic Area Management Plan* (Gorge Commission 2020)	Y	Y	CRGNSA	Page 11-12
U.S. Bureau of Land Management (BLM) – National Wild and Scenic Rivers; "Two Rivers" and "Northwestern and Coastal Oregon" region	National Wild and Scenic Rivers: *Lower Deschutes National Wild and Scenic River 1993 Management Plan* (BLM 1993) and *Supplement to the Lower Deschutes River Management Plan* (BLM 1997)	Y	Y	Lower Deschutes National Wild and Scenic River	*Lower Deschutes National Wild and Scenic River 1993 Management Plan* Page 17-21
	"Two Rivers" and "Northwestern and Coastal Oregon" region: *Proposed Two Rivers Resource Management Plan Environmental Impact Statement* (BLM 1985); *Northwestern and Coastal Oregon Record of Decision and Resource Management Plan* (BLM 2016)	Y	Y	Deschutes River Canyon	*Proposed Two Rivers Resource Management Plan,* Pages 24-25, 28
U.S. Fish and Wildlife Service (USFWS)	*Ridgefield National Wildlife Refuge Comprehensive Conservation Plan* (USFWS 2010)	Y	Y	Sauvie Island Wildlife Area, Burlington Bottoms Wildlife Mitigation Site, Wapato Access Greenway State Park, Vancouver Lake Regional Park, West Hayden Island, Government Island, Lemon Island, Smith and Bybee Wetland Natural Area	Page 1-23, Table 1.2

Jurisdiction	Plan	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resource in Analysis Area (Y/N)	Name of Important or Significant Scenic Resource(s) in Analysis Area	Location Scenic Resources Discussed in Plan
National Park Service (NPS)	*Comprehensive Management and Use Plan* (NPS, 1999); *Fort Vancouver National Historic Site General Management Plan* (NPS 2003)	Y	Y	Historic Oregon Trail	*Comprehensive Management and Use Plan* Page 35, 42
U.S. Army Corps of Engineers (USACE)	*Mid-Columbia River Regional Master Plan and Integrated Environmental Assessment* (USACE 2020)	Y	Y	Columbia River Gorge National Scenic Area	Section 2.14.2

3.5.1 Columbia River Gorge National Scenic Area

The CRGNSA is a significant scenic resource partially located within the analysis area. It is an 85-mile-long National Scenic Area (NSA) covering both sides of the Columbia River from the outskirts of Portland, Oregon in the west to Wasco County, Oregon and Klickitat County, Washington in the east. Per the *Management Plan for the Columbia River Gorge National Scenic Area* (Gorge Commission 2020), urban areas are exempt from CRGNSA regulations (page 356). The aboveground elements of the proposal are within NSA urban areas (Portland and The Dalles), and are, therefore, exempt from CRGNSA regulations. The remainder of the Facility components will be located either underground or under the bed of the Columbia River and will not be visible.

3.5.2 U.S. Bureau of Land Management (BLM)

BLM administers the National Wild and Scenic Rivers Program, which includes the Lower Deschutes River within the analysis area. The *Lower Deschutes River Management Plan Record of Decision* (BLM 1993) and the *Supplement to the Lower Deschutes River Management Plan* (BLM et al. 1997) only mentions the Lower Deschutes National Wild and Scenic River as a scenic resource, and this is shown in Figure 2B (Section 10).

Two BLM land use planning regions[5] are within the analysis area: “Two Rivers” and “Northwestern and Coastal Oregon.” The *Proposed Two Rivers Resource Management Plan* (BLM 1985) for the “Two Rivers” region mentions BLM special management areas with scenic qualities, which includes John Day River Canyon, Deschutes River Canyon, and other miscellaneous scenic areas. The *Northwestern & Coastal Oregon Record of Decision and Resource Management Plan* (BLM 2016) does not include scenic resources. John Day River Canyon is outside of the analysis area, however, the part of the Deschutes River Canyon (the Lower Deschutes Wild and Scenic River) is within the analysis area and shown in Figure 2B (Section 10).

3.5.3 U.S. Fish and Wildlife Service (USFWS)

The USFS established and manages the Ridgefield National Wildlife Refuge, which is within the analysis area. The *Ridgefield National Wildlife Refuge Comprehensive Conservation Plan* (USFWS 2010) includes a list of protected state and regional wildlife habitat areas that are managed primarily for recreational use, but also wildlife and scenic values. There are eight such protected areas within the analysis area:

- Sauvie Island Wildlife Area
- Burlington Bottoms Wildlife Mitigation Site
- Wapato Access Greenway State Park
- Vancouver Lake Regional Park
- West Hayden Island
- Government Island
- Lemon Island
- Smith and Bybee Wetland Natural Area

[5] Bureau of Land Management. Oregon/Washington Planning and NEPA: https://www.blm.gov/programs/planning-and-nepa/plans-in-development/Oregon-washington

Government Island and Wapato Access Greenway State Park are shown in Figure 3 of the Protected Areas Exhibit of this application. Smith and Bybee Wetland Natural Area and Sauvie Island Wildlife Area (under "Multnomah County Identified Viewing Areas") are shown in Figure 2A (Section 10). Burlington Bottoms Wildlife Mitigation Site, Vancouver Lake Regional Park, West Hayden Island, and Lemon Island are shown in Figure 2A (Section 10) under "USFWS Significant Scenic Resources".

3.5.4 National Park Service (NPS)

The *NPS Comprehensive Management and Use Plan* (NPS 1999) identifies Oregon National Historic Trail as a significant scenic resource, and portions of the Oregon Trail is located within the analysis area. The *Fort Vancouver National Historic Site General Management Plan* (NPS 2003) identifies Fort Vancouver National Historic Site as a historical resource; however, the plan does not mention if it is a scenic resource. The Oregon National Historic Trail is shown in Figure 3 of the Protected Areas Exhibit of this application.

3.5.5 U.S. Army Corps of Engineers

The USACE owns The Dalles Lock and Dam, located in the analysis area. Section 2.14 of the USACE *Mid-Columbia River Regional Master Plan and Integrated Environmental Assessment* (USACE 2020) identifies the Columbia River Gorge National Scenic Area (CRGNSA) as a significant visual resource in the Mid-Columbia River region. Within the CRGNSA, the Columbia River, I-84, and SR-14 are identified as scenic resources in the plan. CRGNSA, I-84, and SR 14 are shown on Figure 2A (Section 10).

4 Methodology and Impact Assessment (OAR 345-022-0080(5)(c)(d))

(c) A description of the methodology the applicant used to identify and assess potential visual impacts to the scenic resources identified in paragraph (a)

RESPONSE

To identify potential visual impacts to scenic resources, the Applicant conducted a zone of visual influence (ZVI) analysis using ESRI geographic information system (GIS) software. For this analysis, the proposed converter stations and the short segment (about 500 feet) of aboveground high-voltage alternating current (HVAC) cables at the eastern converter station location were assumed to be 60 feet tall (see the Background Information Exhibit).

The "area of potential visibility" shown in Figure 3A (Section 10) represents the estimated area from which proposed aboveground infrastructure could potentially be visible. This is a highly conservative estimate of visibility for two reasons. First, the analysis used a U.S. Geological Survey (USGS) Digital Elevation Model (DEM)[6] that represents a "bare-earth" topographic surface. Therefore, the

[6] U.S. Geological Survey (USGS). "What is a digital elevation model (DEM)?" Access: https://www.usgs.gov/faqs/what-digital-elevation-model-dem#:~:text=A%20Digital%20Elevation%20Model%20(DEM)%20is%20a%20representation%20of%20the,derived%20primarily%20from%20topographic%20maps.

"area of potential visibility" assumes no trees, buildings, or any other aboveground structures exist, when in reality these features block visibility considerably. Second, the ZVI model does not account for distance, lighting, weather, and atmospheric attenuation factors that diminish visibility under actual field conditions.

(d) Identification of potential visual impacts to the scenic resources identified in (A), including, but not limited to, impacts such as:

(i) Loss of vegetation or alteration of the landscape as a result of construction or operation

(ii) Visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality

(iii) Loss of visibility due to air emissions or other pollution resulting from the construction or operation of the proposed facility

RESPONSE

Table 5 and Figures 3B and 3C (Section 10) show where proposed aboveground infrastructure could potentially be visible from significant scenic resources identified under OAR 345-022-0080(5)(a).

Table 5. Identified Significant Scenic Resources

Figure	Jurisdiction(s)	Scenic Resource	Within estimated area of potential visibility (Yes/No)
Figure 3B: Western Converter Station area	City of Portland, OR; Columbia County, OR; Multnomah County, OR	City of Portland Scenic Resource Zone	Yes
		Portland Central City Scenic Resources	No
		Willamette River (n), (g), (r) Greenway Overlay Zone	Yes
	City of Vancouver, WA	Evergreen Way (Officers' Row)	Yes
		Columbia River	Yes
	Multnomah County, OR	Bybee-Howell House	Yes
		Virginia Lakes	Yes
		Sauvie Island Wildlife Refuge	Yes
		Kelley Point Park	Yes
		Smith and Bybee Lakes	Yes
		Highway 30	Yes
		The Multnomah Channel	Yes
		The Willamette River	No
		Public roads on Sauvie Island	Yes
		Tualatin Mountains	Yes
		Forest Park	Yes
		Fred's Marina	Yes
	Washington County	Elk Point Vista	No
		Swede Hill Vista	No
	U.S. Fish and Wildlife Service	Burlington Bottoms Wildlife Mitigation Site	No
		Sauvie Island Wildlife Area	Yes

Figure	Jurisdiction(s)	Scenic Resource	Within estimated area of potential visibility (Yes/No)
		Wapato Access Greenway State Park	Yes
		Vancouver Lake Regional Park	Yes
		West Hayden Island	Yes
		Government Island	No
		Lemon Island	No
		Smith and Bybee Wetland Natural Area/Smith and Bybee Lakes	Yes
Figure 3C: Eastern Converter Station Area	CRGNSA; Clark County, WA; Klickitat County, WA; Multnomah County, OR; The Dalles, OR; USACE	Columbia River Gorge National Scenic Area (CRGNSA)	Yes
	Wasco County, OR;	The Columbia River Gorge	Yes
		The Deschutes River	No
		Historic Columbia River Highway	Yes
		I-84	Yes
	Sherman County, OR; BLM; ODFW; Oregon Parks & Recreation; Oregon State Legislature; Oregon Department of Fish and Wildlife	The Deschutes River Canyon/Lower Deschutes Wild and Scenic River	No
		Lower Deschutes Wild and Scenic River	No
	BLM	Lower Deschutes Wild and Scenic River	No
	NPS	Historic Oregon Trail	No

At the significant scenic resources where aboveground components of the Project are potentially visible, per Table 5, the Applicant considers visual impacts to be low to none (Figure 4A, Section 10). First, as stated above, the area where aboveground projects are potentially visible is a highly conservative estimate. In practice, views of the proposed development from designated scenic resources would be predominantly blocked by trees, buildings, and other infrastructure. Second, at locations where the proposed development may in fact be visible, the proposal would conform with the character of the existing landscape per the analysis below.

Regarding OAR 345-022-0080(5)(d)(i), visual impacts due to “loss of vegetation” are not anticipated because the proposed above-ground infrastructure would be built in grassy areas and not require vegetation clearing. In Portland, the vegetation between the proposed western converter station and the biking/walking path along the Columbia Slough would be maintained to the extent practicable.

The aboveground proposed Project would not notably alter the surrounding landscapes per OAR 345-022-0080(5)(d)(i) “alteration of the landscape as a result of construction or operation” and OAR 345-022-0080(5)(d)(ii) “visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality.” The western converter station would be built in an industrial area on a parcel that neighbors similar industrial buildings (Figure 4A, Section 10). The eastern converter station and aboveground HVAC transmission line would be built on land owned by

the Bonneville Power Administration (BPA) that is used for its existing electricity transmission assets (Figure 4B, Section 10). All proposed aboveground infrastructure would conform to and blend with the existing landscape character and quality. No visual plumes will occur during operation because no exhaust components are proposed.

Finally, regarding OAR 345-022-0080(5)(d)(iii), air emissions and other pollution resulting from construction would be minimal and not limit visibility. During operation, the proposed Project would not generate air emissions or other pollution that would impact visibility.

5 Assessment of Impact Significance (OAR 345-0022-0080(5)(e))

(e) An assessment of the significance of the visual impacts described under paragraph (d).

RESPONSE

Per the reasoning in response to OAR 345-022-0080(5)(d) above, the Applicant does not anticipate any significant impacts to scenic resources identified as important or significant by applicable land use plans.

6 Avoidance, Reduction, and Mitigation (OAR 345-022-0080(5)(f))

(f) A description of the measures the applicant proposes to avoid, reduce or otherwise mitigate any potential significant adverse impacts;

RESPONSE

The Applicant has proposed aboveground infrastructure in industrial, pre-disturbed areas that would avoid and minimize visual impacts.

The proposal would comply with applicable land use requirements for building height, setbacks, landscaping, vegetation screening, exterior storage, fencing, outdoor lighting and glare, and any other requirements related to the visual appearance of the proposal. See Land Use Exhibit sections about the City of Portland and Wasco County for information on land use compliance for aboveground Project elements.

7 Monitoring (OAR 345-022-0080(5)(g))

(g) The applicant's proposed monitoring program, if any, for impacts to scenic resources.

RESPONSE

Post-construction monitoring for visual impacts is not proposed. Unlike some other types of impacts, such as some potential impacts to biological resources, visual impacts typically do not change over time. Therefore, monitoring for visual impacts would not provide meaningful information.

8 Conclusions

The proposed transmission facility would be located aboveground only at the two converter stations and the remainder of the facility is to be located either underground or beneath the bed of the Columbia River. The information provided in this exhibit demonstrates that the design, construction, and operation of the proposed Project would not result in significant adverse impacts to scenic resources and therefore complies with the scenic resource standard under OAR 345-022-0080.

9 References

Bureau of Land Management (BLM), Prineville District Office. 1985. *Final Proposed Two Rivers Resource Management Plan Environmental Impact Statement*. Accessed May 2024: https://www.blm.gov/sites/blm.gov/files/planning-orwa-pdo-tworiversrmp-eis-sep85.pdf.

____. 1993. *Lower Deschutes River Management Plan Record of Decision*. February 1993. Accessed May 2024: https://www.rivers.gov/sites/rivers/files/documents/plans/lower-deschutes-ea.pdf.

Bureau of Land Management (BLM), Coos Bay, Eugene, and Salem Districts, and Swiftwater Field Office of Roseburg District. 2016. *Northwestern and Coastal Oregon Record of Decision and Approved Resource Management Plan*. August 2016. Accessed May 2024: https://eplanning.blm.gov/public_projects/lup/57902/79046/91311/NCO_ROD_RMP_ePlanning.pdf.

Bureau of Land Management (BLM), Bureau of Indian Affairs, Confederated Tribes of the Warm Springs Reservation, and State of Oregon. 1997. *Supplement to the Lower Deschutes River Management Plan*. Final Decision. Lower Deschutes River Allocation System. June 1997. Accessed May 2024: https://www.rivers.gov/sites/rivers/files/documents/plans/lower-deschutes-plan-supplement-allocation-system.pdf.

City of Beaverton. 2022. *Comprehensive Plan*. Accessed May 2024: https://www.beavertonoregon.gov/375/Comprehensive-Plan.

City of Hillsboro. 2020. *Hillsboro 2035 Community Plan.* Adopted August 2020. Accessed May 2025: https://www.hillsboro2035.org/2035-plan/view-download-plan/.

____. 2022. *Hillsboro Comprehensive Plan*. Adopted November 2017. Amended November 2022. Accessed May 2024: https://www.hillsboro-oregon.gov/home/showpublisheddocument/16832/638112929657400000.

City of Portland. 1988. Scenic Views, Sites and Drives Inventory. Adopted November 1988. Accessed January 2025: https://www.portland.gov/bps/planning/environ-planning/environment-river-documents.

____. 1991. Scenic Resources Protection Plan. Adopted April 1991. Accessed May 2025: https://www.portland.gov/bps/planning/environ-planning/documents/scenic-views-sites-corridors-resource-protection-plan-1991/download.

____. 2020a. *Central City 2035: Volume 3A – Scenic Resources Protection Plan – Part 2: Scenic Resources Inventory.* Effective August 2020. Accessed January 2025: https://efiles.portlandoregon.gov/recordhtml/14355708/.

____. 2020b. Proposed Drafts of *Environmental Overlay Zone Map Correction Project – Volume 2 Part B.* June 2020. https://www.portland.gov/sites/default/files/2020-07/proposeddraft_v2b_results_skylinewest.pdf.

____. 2020c. Proposed Drafts of *Environmental Overlay Zone Map Correction Project – Volume 2 Part D.* June 2020. https://www.portland.gov/sites/default/files/2020-07/proposeddraft_v2d_results_fannocreek.pdf.

____. 2022. *Inventory of Natural, Scenic and Open Space Resources for Multnomah County Unincorporated Urban Areas Report*. Adopted by Multnomah County 2001, Effective 2002. https://efiles.portlandoregon.gov/recordhtml/15520075/.

____. 2023. *2035 Comprehensive Plan*. Adopted June 2016. Amended May 2023. Accessed May 2024: https://www.portland.gov/bps/planning/comp-plan-2035/about-comprehensive-plan/2035-comprehensive-plan-and-supporting.

City of Scappoose. 2018. *City of Scappoose Comprehensive Plan*. Adopted April 1983. Last amended October 2018. Accessed May 2024: https://www.scappoose.gov/sites/default/files/fileattachments/planning/page/2221/comp_plan_current_through_ord_874_2018-11-15.pdf.

____. 2024. *Scappoose Parks, Trails, and Open Space Plan.* Adopted March 2024. https://www.scappoose.gov/sites/default/files/fileattachments/planning/page/6511/parks_master_plan_2023_appendices_included.pdf.

City of The Dalles. 2024. *The Dalles, Oregon Comprehensive Land Use Plan*. Adopted May 1994. Last Amended February 2024. Accessed May 2024: https://library.qcode.us/lib/the_dalles_or/pub/comp_plan/item/goal_1?view=all.

City of Vancouver. 2021. *Vancouver Comprehensive Plan 2011-2030*. Adopted 2008. Last Amended 2021. Accessed May 2024: https://www.cityofvancouver.us/wp-content/uploads/2023/09/Comprehensive_Plan_2011-2030_AUG_2021_Update.pdf.

Clark County. 2022. *20-Year Comprehensive Growth Management Plan 2015-2035*. Adopted 2016. Last Amended 2022. Access May 2024: https://clark.wa.gov/sites/default/files/media/document/2023-01/2015-2035%20Comprehensive%20Plan-ORD.%202022-07-01%20AR_Dockets.pdf.

Columbia County. 2023. *Columbia County Comprehensive Plan*. Adopted August 1984. Amended October 2023. Accessed May 2024: https://www.columbiacountyor.gov/media/Land_Development/planning%20division%20files/COMP%20PLAN%202023.pdf.

EcoTrust. 2011. Prepared for City of Dalles. *2011 Scenic Resources Evaluation.* https://cms8.revize.com/revize/dallesor/business/applications%20&%20documents/planning%20department/Urban%20Growth%20Boundary%20Expansion/Exhibit%20B.pdf.

Gorge Commission. 2020. Management Plan for the Columbia River Gorge National Scenic Area. Accessed May 2024: https://www.gorgecommission.org/images/uploads/pdfs/!_Management_Plan_Complete_and_Formatted.pdf.

Klickitat County. 2013. *Comprehensive Plan*. Adopted August 1977. Last Amended October 2013. Accessed May 2024: https://www.klickitatcounty.org/DocumentCenter/View/13818/Klickitat-County-Comp-Plan-091316.

Multnomah County. 2016. *Multnomah County Comprehensive Plan*. Adopted September 2016. Accessed May 2024: https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/Multnomah%20County%20Comprehensive%20Plan%20-%20Order%202023-090%20effective%2010.26.23.pdf.

National Park Service (NPS). 2003. *Fort Vancouver National Historic Site General Management Plan*. Accessed May 2024: https://parkplanning.nps.gov/document.cfm?parkID=302&documentID=25315.

Oregon Department of Fish and Wildlife (ODFW). 2021. *Lower Deschutes Wildlife Area Management Plan*. Accessed May 2024: https://myodfw.com/sites/default/files/2021-02/2021_LDWA_Plan.pdf.

____. 2012. Sauvie Island Wildlife Area Management Plan. Accessed May 2024: https://www.dfw.state.or.us/wildlife/management_plans/wildlife_areas/docs/SIWA%20Management%20Plan%20April%202012.pdf.

Oregon Metro. 2014. *Regional Framework Plan*. Adopted 1997. Accessed January 2025: https://www.oregonmetro.gov/regional-framework-plan.

Oregon Parks and Recreation Department (OPRD). 2015a. *Oregon Natural Areas Plan*. Accessed May 2024: https://inr.oregonstate.edu/sites/inr.oregonstate.edu/files/2015_or_natural_areas_plan.pdf.

____. 2015b. *Columbia River Gorge Management Units Plan*. Accessed May 2024:
Part 1 - https://www.oregon.gov/oprd/PRP/Documents/PLA-Adopted-Gorge-2015-Ch-1-6.pdf.
Part 2 - https://www.oregon.gov/oprd/PRP/Documents/PLA-Adopted-Gorge-2015-Ch-7-13.pdf.

Portland Bureau of Planning and Sustainability. 2020. *Willamette River Greenway Inventory*. An Update to Portland's Statewide Planning Goal 15 Inventory. Adopted December 2020. Accessed May 2024: https://www.portland.gov/bps/planning/environ-planning/wrg-inventory/about file:///C:/Users/lthode/Downloads/2020-12-16_RIV_WRGI_Adopted.PDF.

Sherman County. 2007. *Comprehensive Land Use Plan*. Adopted 1994. Amended 2007. Accessed May 2024: https://storage.googleapis.com/proudcity/shermancountyor/uploads/2017/10/Sherman_County_Comprehensive_Land_Use_Plan.pdf.

U.S. Army Corps of Engineers (USACE), Portland District. 2020. *Mid-Columbia River Regional Master Plan & Integrated Environmental Assessment*. Skamania, Klickitat, and Benton Counties, Washington. Multnomah, Hood River, Wasco, Sherman, Gilliam, Morrow, and Umatilla Counties, Oregon. Accessed April 2025: https://usace.contentdm.oclc.org/digital/collection/p16021coll7/id/12018.

U.S. Fish and Wildlife Service (USFWS). 2010. *Ridgefield National Wildlife Refuge Comprehensive Conservation Plan*. September 2010. Accessed May 2024: https://ecos.fws.gov/ServCat/DownloadFile/5753.

Wasco County. 2010. *Wasco County Comprehensive Plan*. Adopted August 1983. Last Amended June 2010. Accessed February 2025: https://www.co.wasco.or.us/departments/planning/wasco_county_comprehensive_plan.php.

Washington County. 2024a. *Washington County Comprehensive Plan*. Adopted May 1994. Amended November 2024. Accessed February 2025: https://www.washingtoncountyor.gov/lut/planning/documents/comprehensive-framework-plan-urban-area-11-2024/download?inline.

____. 2024b. Community Plans. Updated November 2024. Accessed February 2025: https://www.washingtoncountyor.gov/lut/planning/community-plans.

____. 2024c. *Washington County Transportation System Plan*. Effective November 18, 2024. Accessed February 2025: https://www.washingtoncountyor.gov/lut/planning/transportation-system-planm
https://washcomultimedia.s3.amazonaws.com/CMSBigFiles/Comprehensive+Plan/CFP_July_2022_WEB.pdf.

Washington Department of Fish and Wildlife (WDFW). 2016. *Klickitat Wildlife Area Management Plan*. August 2016. Accessed May 2024: https://wdfw.wa.gov/sites/default/files/publications/01846/wdfw01846.pdf.

____. 2006. Shillapoo Wildlife Area Management Plan. Accessed May 2024: https://wdfw.wa.gov/sites/default/files/publications/00536/wdfw00536.pdf.

Washington State Parks and Recreation Commission. 2020. Washington State Parks Strategic Plan 2021-2031. Achieving a healthy, sustainable park system. September 2020. Accessed May 2024: https://parks.wa.gov/sites/default/files/2023-10/2020-9%20Strategic%20Plan.pdf.

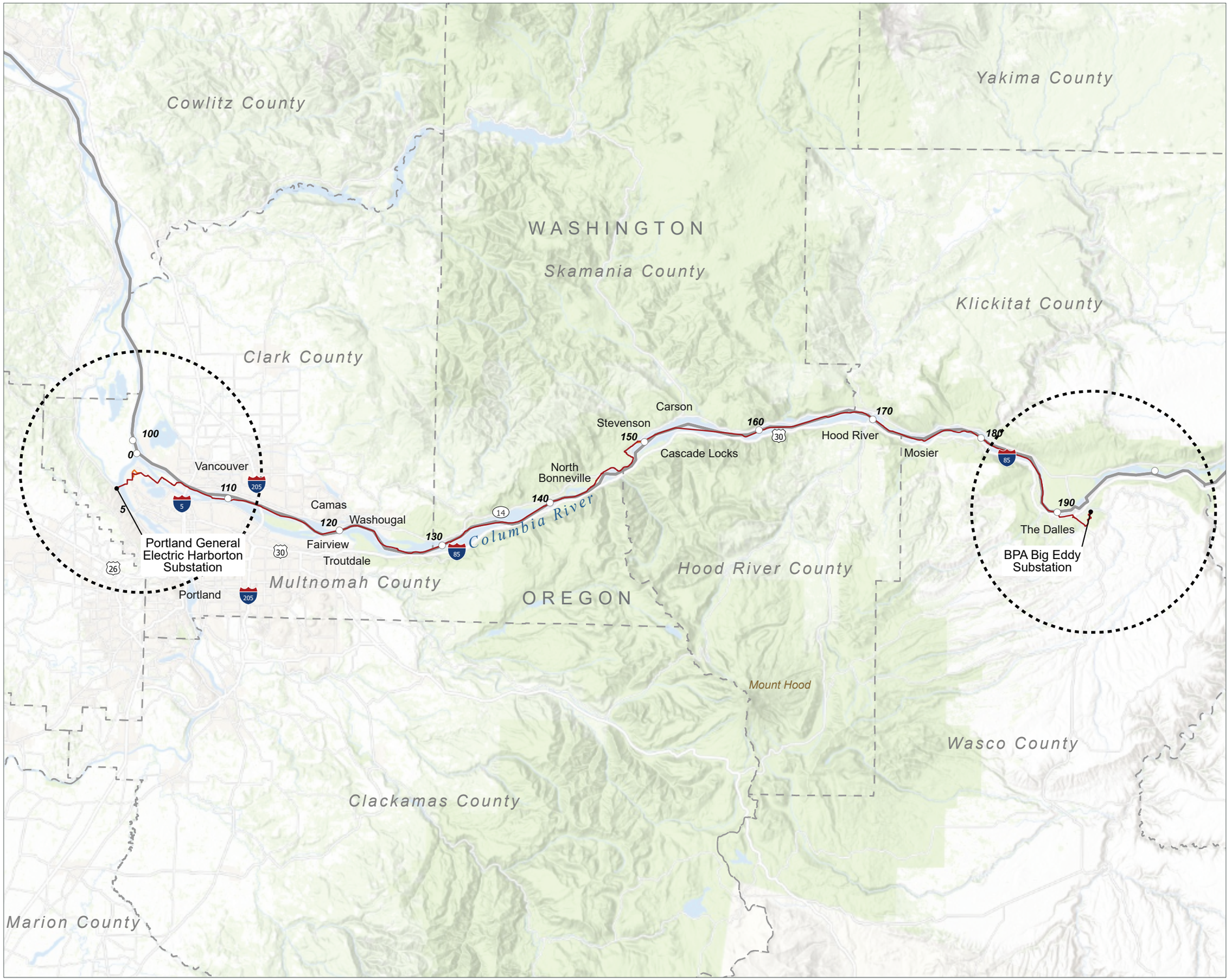
Winterbrook Planning. May 2013. Prepared for City of The Dalles. *The Dalles Growth Management Report*. Accessed January 2025: https://cms8.revize.com/revize/dallesor/business/applications%20&%20documents/planning%20department/Urban%20Growth%20Boundary%20Expansion/Growth%20Management%20Report.pdf.

10 Figures

FIGURE 1
ANALYSIS AREA

FOR INFORMATION ONLY - CONCEPT DRAWING

- PROPOSED ALIGNMENT
- ALTERNATIVES
- RIVER MILES (USACE)
- COUNTY BOUNDARY
- STATE BOUNDARY
- EXHIBIT R ANALYSIS AREA (10 MI)



CASCADE RENEWABLE TRANSMISSION

HDR

0 10 mi

1:525,000

10/15/2025 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR.

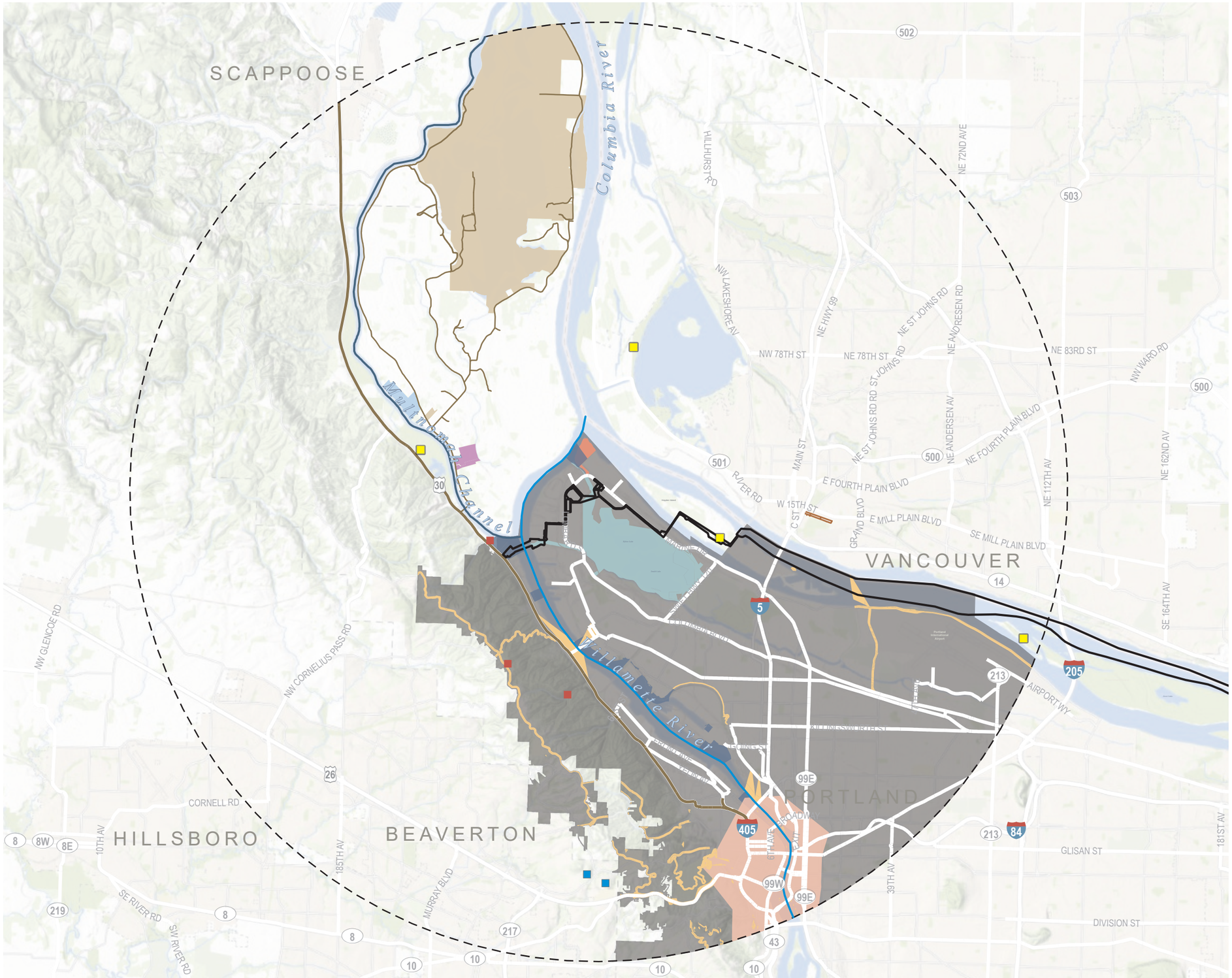


FIGURE 2A
SCENIC RESOURCES (WEST)

FOR INFORMATION ONLY - CONCEPT DRAWING

- OREGON EFSC SITE BOUNDARY
- STATE BOUNDARY
- EXHIBIT R ANALYSIS AREA (10 MI)
- CITY OF PORTLAND – SCENIC RESOURCE ZONE
- PORTLAND URBAN SERVICES BOUNDARY
- CENTRAL CITY SCENIC RESOURCES
- COLUMBIA RIVER
- WILLAMETTE RIVER (N), (G), (R) GREENWAY OVERLAY ZONE
- MULTNOMAH CHANNEL
- WILLAMETTE RIVER
- EVERGREEN WAY (OFFICERS' ROW)
- PUBLIC ROADS ON SAUVIE ISLAND
- US 30 HIGHWAY
- WASHINGTON COUNTY SIGNIFICANT SCENIC RESOURCES
- MULTNOMAH COUNTY SIGNIFICANT SCENIC RESOURCES
- USFWS SIGNIFICANT SCENIC RESOURCES

MULTNOMAH COUNTY VIEWING AREAS

- BYBEE-HOWELL HOUSE
- VIRGINIA LAKES
- SAUVIE ISLAND WILDLIFE AREA
- KELLEY POINT PARK
- SMITH AND BYBEE LAKES

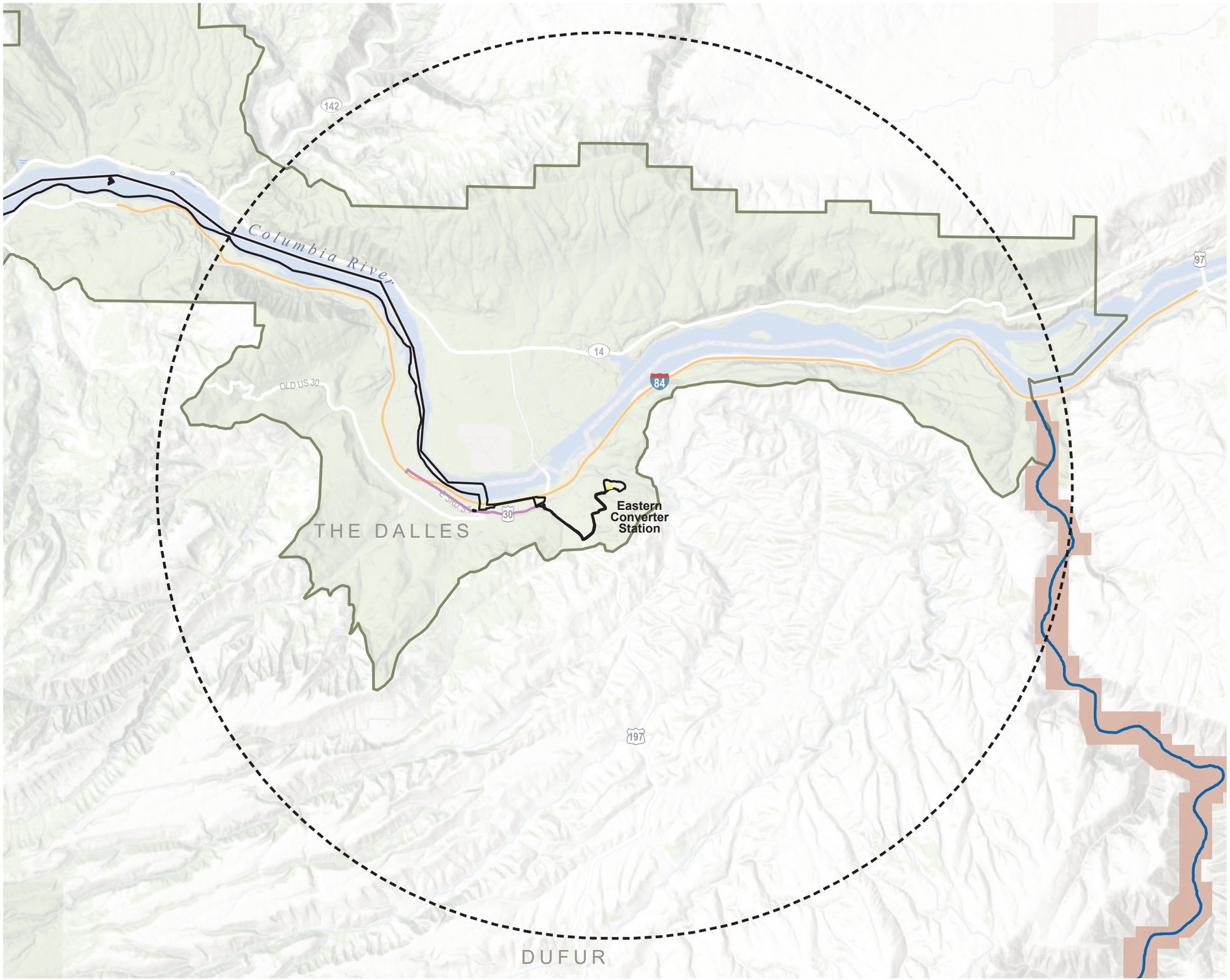
CASCADE RENEWABLE TRANSMISSION

0 2.5 mi
1:135,000

12/3/2025 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR.

FIGURE 2B
SCENIC RESOURCES (EAST)

FOR INFORMATION ONLY - CONCEPT DRAWING



- CONVERTER STATION
- OREGON EFSC SITE BOUNDARY
- STATE BOUNDARY
- EXHIBIT R ANALYSIS AREA (10 MI)
- LOWER DESCHUTES RIVER
- COLUMBIA RIVER GORGE NATIONAL SCENIC AREA
- LOWER DESCHUTES WILD AND SCENIC RIVER
- COLUMBIA RIVER
- I-84
- HISTORIC COLUMBIA RIVER HIGHWAY
- STATE ROUTE 14

CASCADE RENEWABLE TRANSMISSION

0 — 3 mi

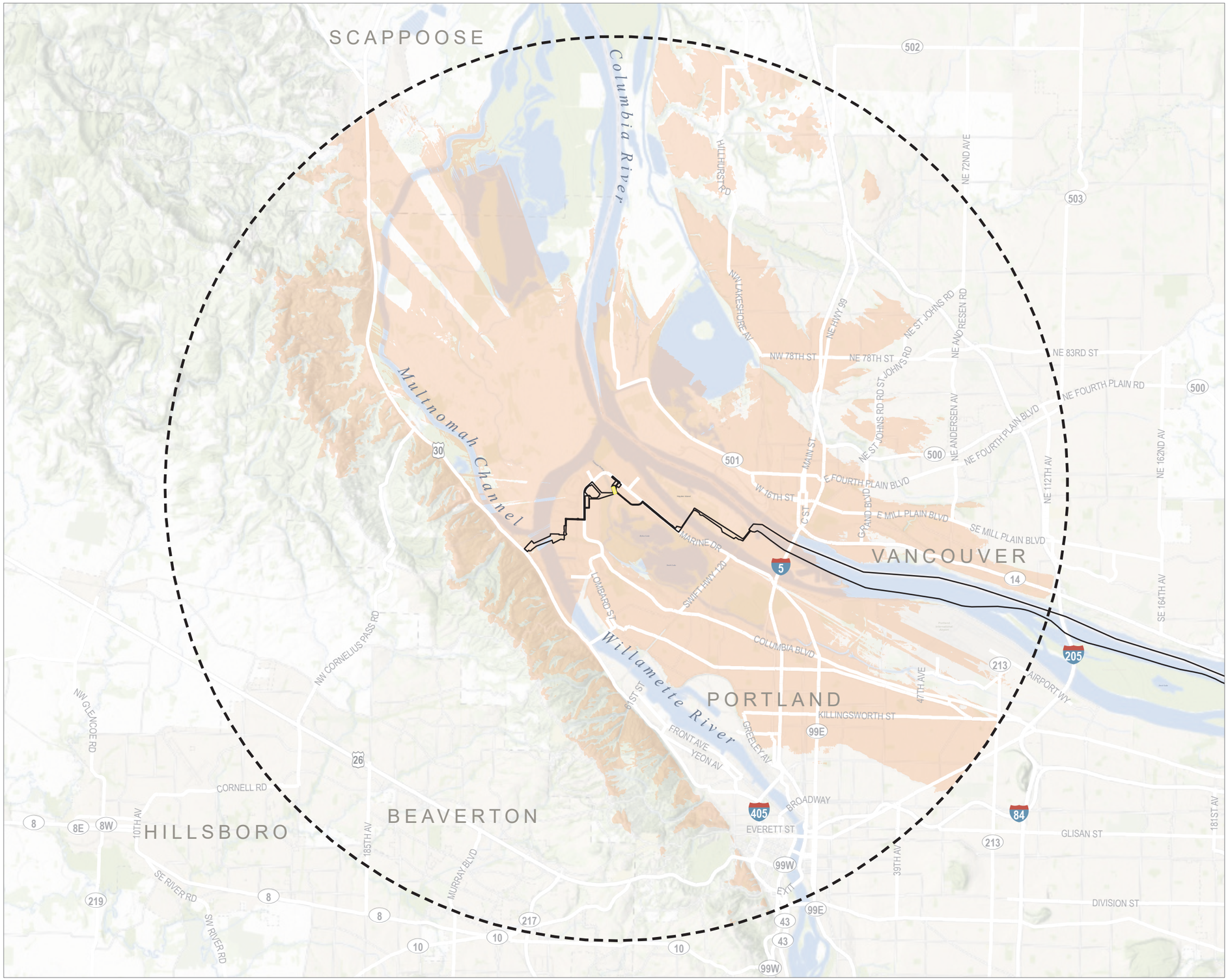
1:140,000

12/3/2025 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR.

FIGURE 3A
ZONE OF VISUAL INFLUENCE ANALYSIS (WEST)

FOR INFORMATION ONLY - CONCEPT DRAWING

- CONVERTER STATION
- OREGON EFSC SITE BOUNDARY
- EXHIBIT R ANALYSIS AREA (10 MI)
- AREA OF POTENTIAL VISIBILITY



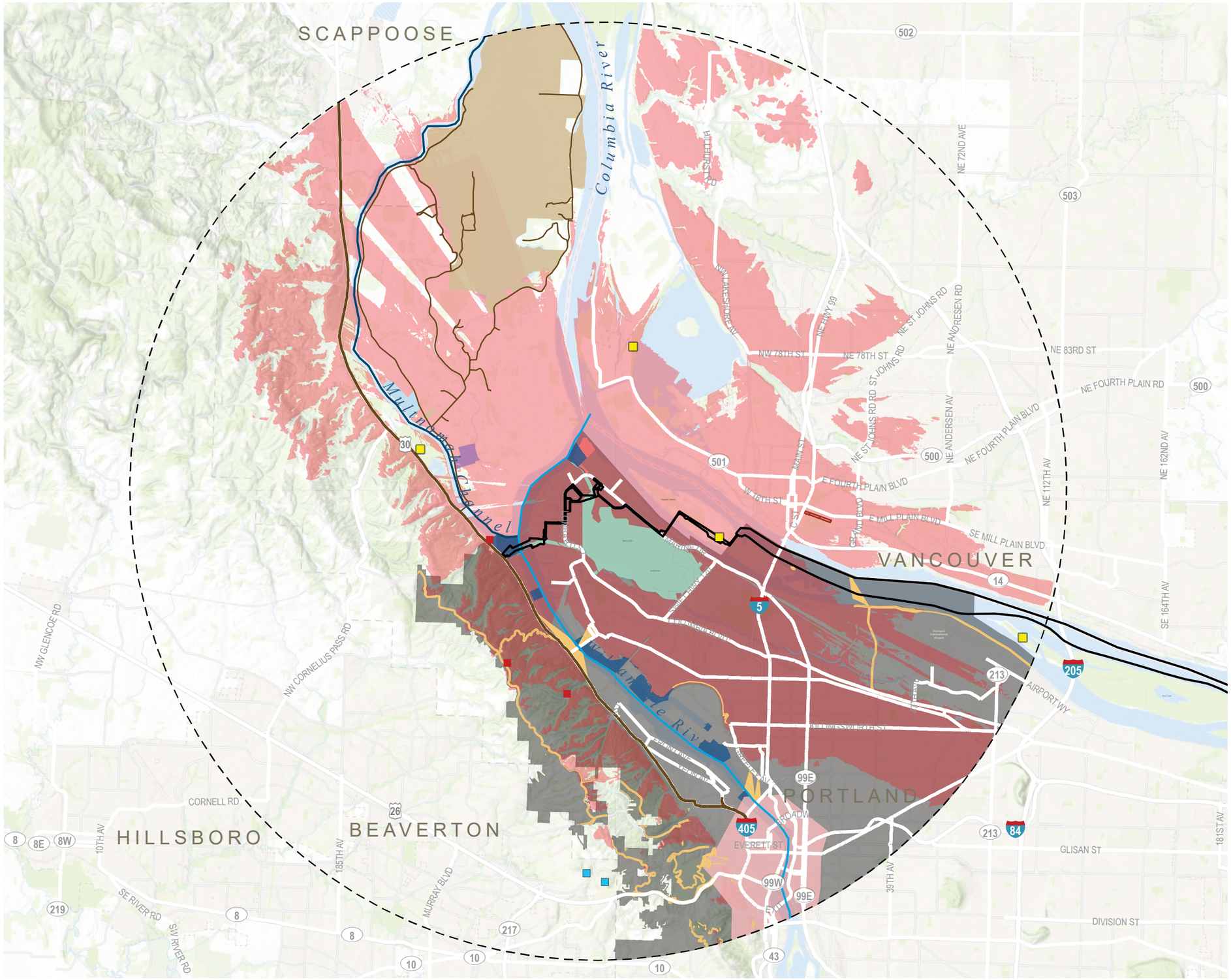
CASCADE RENEWABLE TRANSMISSION

0 3 Miles
1:2,200,000

12/4/2025 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR.

FIGURE 3B
ZONE OF VISUAL INFLUENCE & SCENIC RESOURCES (WEST)

FOR INFORMATION ONLY - CONCEPT DRAWING



OREGON EFSC SITE BOUNDARY
STATE BOUNDARY
EXHIBIT R ANALYSIS AREA (10 MI)
CITY OF PORTLAND – SCENIC RESOURCE ZONE
PORTLAND URBAN SERVICES BOUNDARY
CENTRAL CITY SCENIC RESOURCES
COLUMBIA RIVER
WILLAMETTE RIVER (N), (G), (R) GREENWAY OVERLAY ZONE
MULTNOMAH CHANNEL
WILLAMETTE RIVER
EVERGREEN WAY (OFFICERS' ROW)
PUBLIC ROADS ON SAUVIE ISLAND
US 30 HIGHWAY
WASHINGTON COUNTY SIGNIFICANT SCENIC RESOURCES
MULTNOMAH COUNTY SIGNIFICANT SCENIC RESOURCES
USFWS SIGNIFICANT SCENIC RESOURCES
AREA OF POTENTIAL VISIBILITY

MULTNOMAH COUNTY VIEWING AREAS

BYBEE-HOWELL HOUSE
VIRGINIA LAKES
SAUVIE ISLAND WILDLIFE AREA
KELLEY POINT PARK
SMITH AND BYBEE LAKES

CASCADE RENEWABLE TRANSMISSION

0 — 2.5 mi
1:135,000

10/15/2025 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR.

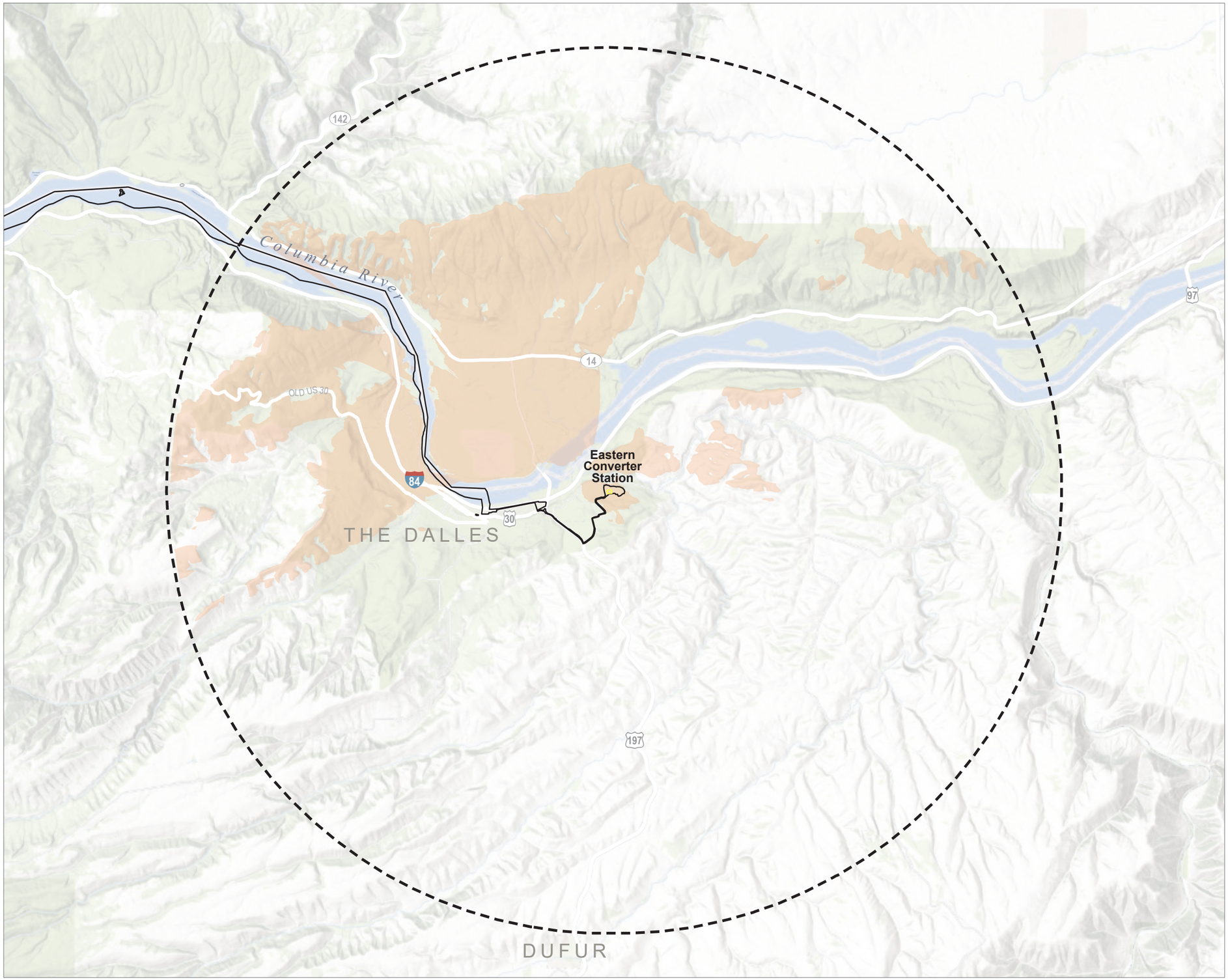


FIGURE 3C
ZONE OF VISUAL INFLUENCE ANALYSIS

FOR INFORMATION ONLY - CONCEPT DRAWING

- CONVERTER STATION
- OREGON EFSC SITE BOUNDARY
- STATE BOUNDARY
- EXHIBIT R ANALYSIS AREA (10 MI)
- AREA OF POTENTIAL VISIBILITY

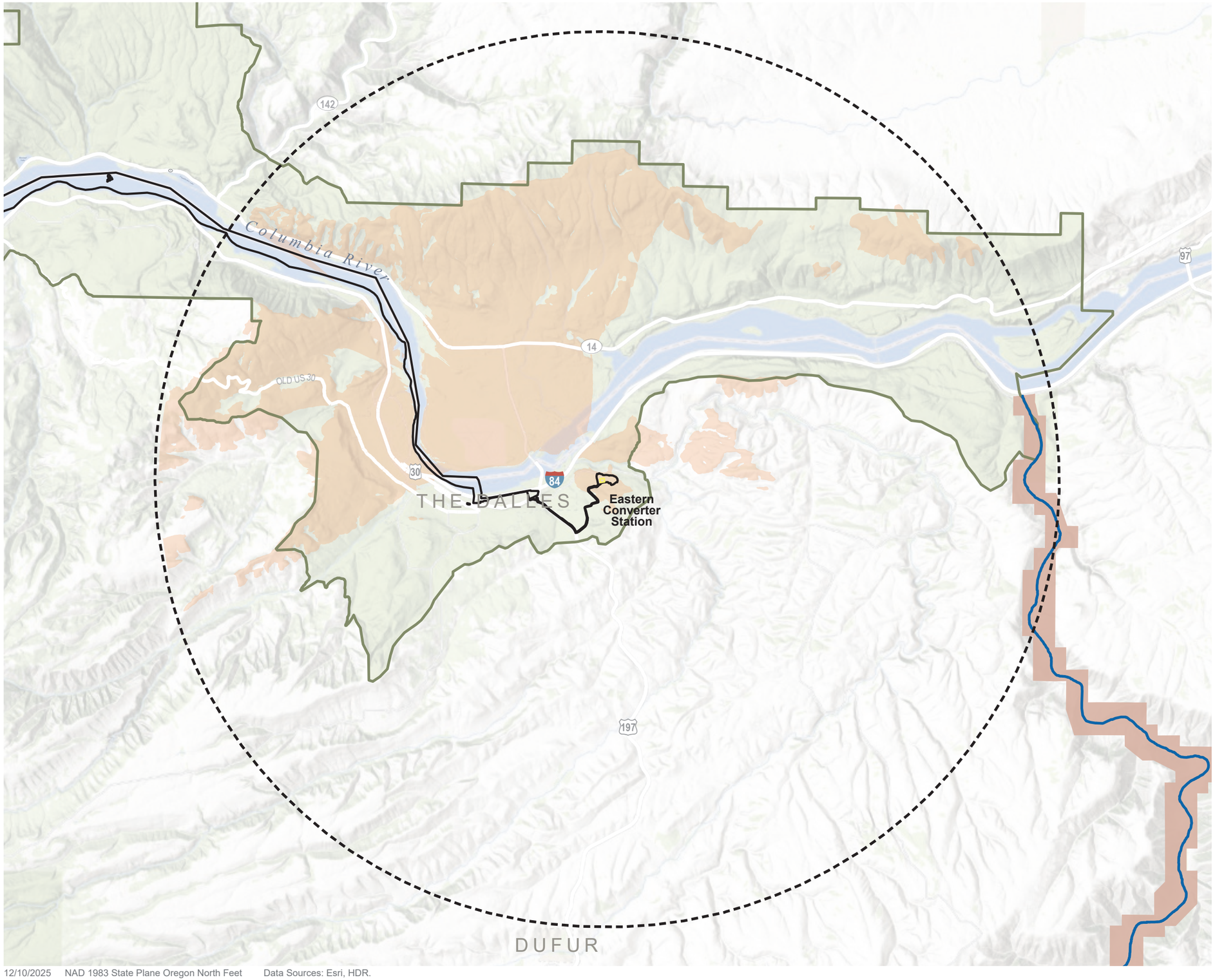
CASCADE RENEWABLE TRANSMISSION

0 3 Miles
1:2,200,000

12/10/2025 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR.

FIGURE 3D
ZONE OF VISUAL INFLUENCE & SCENIC RESOURCES (EAST)

FOR INFORMATION ONLY - CONCEPT DRAWING



- CONVERTER STATION
- OREGON EFSC SITE BOUNDARY
- EXHIBIT R ANALYSIS AREA (10 MI)
- STATE BOUNDARY
- LOWER DESCHUTES RIVER
- STATE ROUTE 14
- COLUMBIA RIVER GORGE NATIONAL SCENIC AREA
- LOWER DESCHUTES WILD AND SCENIC RIVER
- COLUMBIA RIVER
- AREA OF POTENTIAL VISIBILITY

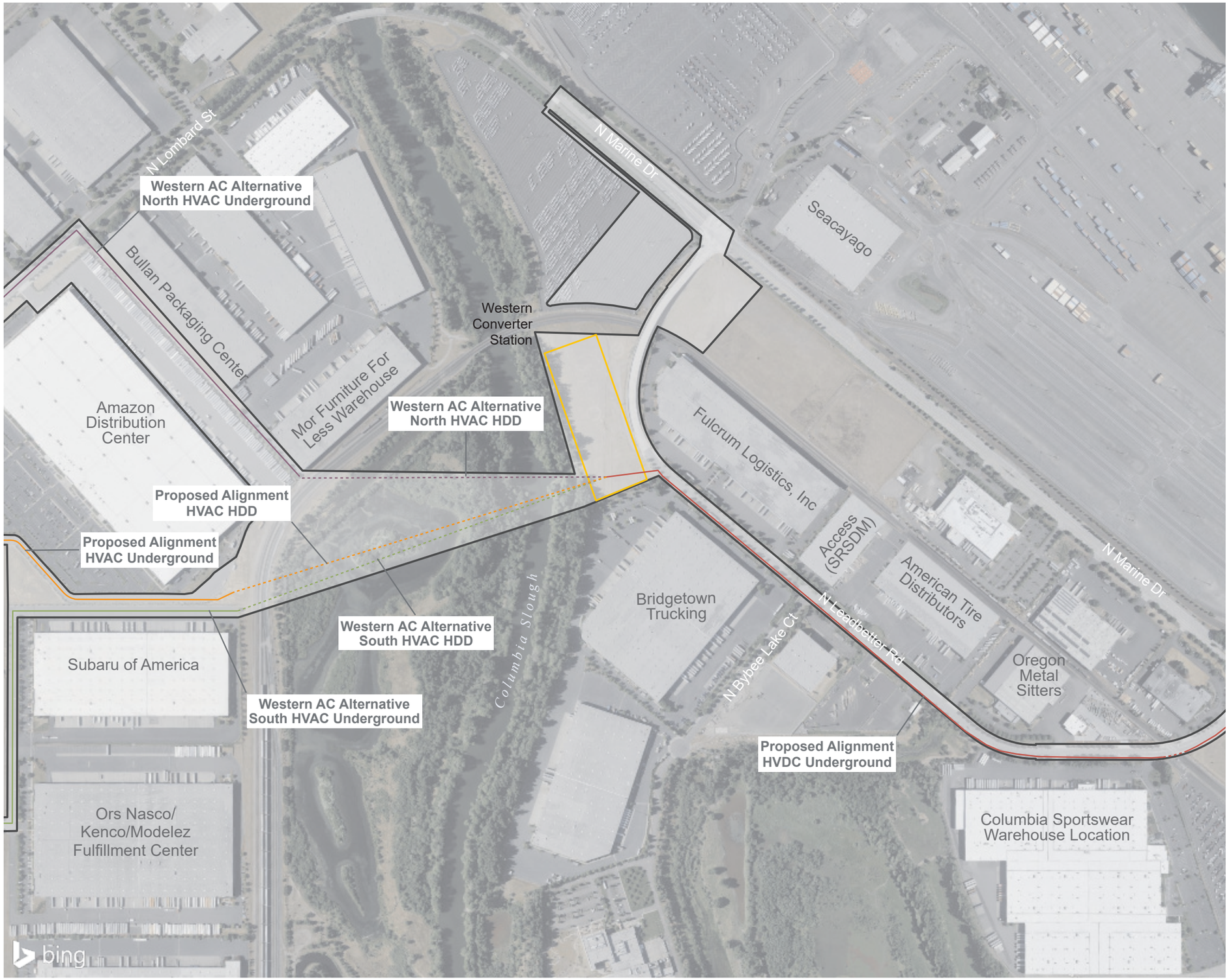
CASCADE RENEWABLE TRANSMISSION

0 — 3 mi

1:140,000

12/10/2025 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR.

FIGURE 4A
INDUSTRIAL AREA AT WESTERN CONVERTER STATION



FOR INFORMATION ONLY - CONCEPT DRAWING

- PROPOSED ALIGNMENT - HVAC HDD
- PROPOSED ALIGNMENT - HVAC UNDERGROUND
- WESTERN AC ALTERNATIVE NORTH - HVAC HDD
- WESTERN AC ALTERNATIVE NORTH - HVAC UNDERGROUND
- WESTERN AC ALTERNATIVE SOUTH - HVAC HDD
- WESTERN AC ALTERNATIVE SOUTH - HVAC UNDERGROUND
- PROPOSED ALIGNMENT - HVDC HDD
- PROPOSED ALIGNMENT - HVDC UNDERGROUND
- CONVERTER STATION
- OREGON EFSC SITE BOUNDARY

CASCADE RENEWABLE TRANSMISSION

HDR

0 500 Feet

1:6,000

12/15/2025 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR, CWPP Planning Tool Oregon Explorer

12/15/2025 NAD 1983 State Plane Oregon North Feet Data Sources: Esri, HDR, CWPP Planning Tool Oregon Explorer

FIGURE 4B
INDUSTRIAL AREA AT EASTERN CONVERTER STATION

FOR INFORMATION ONLY - CONCEPT DRAWING

PROPOSED ALIGNMENT - HVDC UNDERGROUND

CONVERTER STATION

OREGON EFSC SITE BOUNDARY

CASCADE RENEWABLE TRANSMISSION

0 500 Feet

1:5,000