Protected Areas Exhibit

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REFERENCE
Oregon Energy Facility Siting Council

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
Applicant	DECH bn, LLC
BESS	Battery energy storage system
BrightNight	BrightNight, LLC
dBA	Decibels
ESCP	Erosion and Sediment Control Plan
Facility	Solar photovoltaic power generation facility and related or supporting facilities in Wasco County, Oregon
NRCS	National Resources Conservation Service
O&M	Operation and Maintenance
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
SPCC	Spill Prevention, Control, and Countermeasure

1. INTRODUCTION

DECH bn, LLC (Applicant) plans to construct a solar photovoltaic power generation facility and related or supporting facilities in Wasco County, Oregon (Facility). The Facility will include up to 1,000 megawatts of solar capacity and a battery energy storage system (BESS) with up to 4,000 megawatt hours storage capacity. This Protected Areas Exhibit has been prepared to meet the standard outlined in OAR 345-022-0040.

2. PROTECTED AREAS ANALYSIS AREA AND INVENTORY

OAR 345-022-0040(5)
(a) A list of all protected areas within the analysis area identifying:
(A) The distance and direction of the protected area from the proposed facility
(B) The basis for protection by reference to a specific subsection of OAR 345-001-0010(26); and
(C) The name, mailing address, phone number, and email address of the land management agency or organization with jurisdiction over the protected area.
(b) A map showing the location of the proposed facility in relation to the protected areas;

The analysis area for protected areas is the site boundary plus 20 miles. There are 22 protected areas within the analysis area, listed in Table 1 below, all of which are outside of the site boundary. The closest protected area to the site boundary is the White River Wildlife Area, approximately 0.01 mile to the northwest of the site boundary and the farthest protected area is the Pacific Crest National Trail, approximately 20 miles northwest of the site boundary. Attachment 1 provides a list of protected areas within the analysis area identifying the distance and direction from the Facility, as well as the basis for protection. Attachment 2 provides contact information for each managing agency. Attachment 3, Figure 1 provides a map of the Facility and the protected areas within the analysis area.

The basis for protection of each area emphasizes different priorities for preservation and management. Table 1 below describes the key characteristics of each protected area.

TABLE 1 - PROTECTED AREA DESIGNATIONS

Protected Area	Distance from Site Boundary	Type and Jurisdiction	Protected Attribute
Oregon National Historic Trail	2.2 miles	National Historic Trail OAR 345-001-0010(26)(a)	Extended trails which follow as closely as possible and practicable the original trails or routes of travel of national historic significance[1]. Their purpose is the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment.[2] Note that within the analysis area, the Oregon National Historic Trail is not intact, which means the protected area is the mapped alignment of the trail. There are only limited segments of trail or associated areas within the analysis area accessible to the public.
Lower White River Wilderness Area	0.1 mile	Wilderness Area OAR 345-022-0040(1)(c)	To provide clean air, water, and habitat critical for rare and endangered plants and animals[3]. To promote, perpetuate, and preserve the wilderness character of the lands, protect watersheds and wildlife habitat, preserve scenic and historic resources, and promote scientific research, primitive recreation, solitude, physical and mental challenge, and inspiration[4].
Badger Creek Wilderness	8.1 miles		
Salmon-Huckleberry Wilderness	18.2 miles		
Mt. Hood Wilderness	13.9 miles		
East Fork Hood Wild and Scenic River	16.4 miles	Wild and Scenic River OAR 345-001-0010(26)(d)	To preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations[5].
White Wild and Scenic River	0.05 mile		
Fifteen-mile Creek Wild and Scenic River	15.1 miles		
Deschutes Wild and Scenic River	3.2 miles		
Salmon Wild and Scenic River	18.6 miles		
Mt. Hood	10.9 miles		

[1] National Trails System
[2] 16 USC Ch. 27: National Trails System
[3] Lower White River Wilderness Area | Bureau of Land Management
[4] Oregon Wilderness Act of 1984
[5] The National Wild & Scenic Rivers System | Rivers.gov

Protected Area	Distance from Site Boundary	Type and Jurisdiction	Protected Attribute
National Recreation Area		National Recreational Area OAR 345-001-0010(26)(g)	To provide for the protection, preservation, and enhancement of recreational, ecological, scenic, cultural, watershed, and fish and wildlife values[6].
Badger Creek National Recreation Area	8.1 miles		
Gumjuwac-Tolo Research Natural Area	13.1 miles	Research Natural Area OAR 345-001-0010(26)(i)(C)	Areas designated to be permanently protected and maintained in natural condition, including unique ecosystems or ecological features; rare or sensitive species of plants and animals and their habitat; and/or high-quality examples of widespread ecosystems[7].
Happy Ridge Hazard Experimental Research Area	9.5 miles	Experimental Research Area OAR 345-001-0010(26)(i)(D)	Long-term research on ecosystem processes, silviculture and forest management options, wildlife habitat characteristics, and forest growth and development[8].
Pacific Crest National Trail	17.3 miles	National Scenic Trail OAR 345-001-0010(26)(i)(E)	To provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, and cultural qualities of the areas through which such trails may pass.[9]
White River Falls State Park	10.4 miles	Parks or other areas under OPRD Jurisdiction OAR 345-001-0010(26)(j)	To provide and protect outstanding natural, scenic, cultural, historic and recreational sites for the enjoyment and education of present and future generations[10].
Barlow Creek Campground	14.7 miles		
Tygh Valley (White River Falls) State Natural Area	10.4 miles	State Natural Area OAR 345-001-0010(26)(l)	To protect high quality native ecosystems and rare plant and animal species[11].
Deschutes River State Scenic Waterway	3.4 miles	State Scenic Waterway OAR 345-001-0010(26)(n)	To protect the free-flowing character of designated rivers, scenic and natural values, recreation, and fish and wildlife[12].
White River Wildlife Area	0.01 mile	Wildlife Area OAR 345-001-0010(26)(o)	The primary purpose of White River Wildlife Area is to provide winter range habitat for black-tailed deer and Rocky Mountain elk and

[6] Mount Hood National Recreation Area
[7] NRS Research Natural Areas | USFS
[8] Experimental Forests and Ranges | USFS
[9] Reference Manual 45: National Trails System (2-6-2019)
[10] Oregon Parks and Recreation
[11] Natural Areas | Oregon State University
[12] Oregon Scenic Waterway Program

Protected Area	Distance from Site Boundary	Type and Jurisdiction	Protected Attribute
			to minimize big game damage to adjacent private agricultural lands[13].
Oak Springs Hatchery	10 miles	Hatchery OAR 345-001-0010(26)(p)	To provide social, economic, and cultural benefits to Oregonians by sustaining sport, commercial, and tribal fishing opportunities[14].
Warm Springs National Fish Hatchery	14.4 miles		

Note: OPRD = Oregon Parks and Recreation Department

3. POTENTIAL IMPACTS

OAR-345-022-0040(5)(c) A description of significant potential impacts of the proposed facility, if any, on the protected areas including, but not limited to, potential impacts such as:

3.1 NOISE IMPACTS

(A) Noise resulting from facility construction or operation;

Of the 22 protected areas within the analysis area, only six are close enough to the site boundary to potentially experience noise impacts from the Facility construction. These six protected areas are segments of the Oregon National Historic Trail (NHT), the White Wild and Scenic River, the White River Wildlife Area, the Lower White River Wilderness Area, the Deschutes Wild and Scenic River, and the Deschutes River State Scenic Waterway. Evaluation of Facility construction noise on these six protected areas is described in Section 3.1.1 below. Operational noise levels are lower than construction noise levels so of these six protected areas that may experience noise from Facility construction, only three (the White Wild and Scenic River, the White River Wildlife Area, and the Lower White River Wilderness Area) will experience noise from operation, which is described in Section 3.2.2 below.

3.1.1 CONSTRUCTION NOISE

Noise from construction will be localized and will vary depending on the source, which is likely to include equipment such as excavators and generators and activities such as pile driving and vehicle traffic. Equipment and activities may result in both intermittent high-decibel noise events and sustained background noise levels within the site boundary. Construction noise levels will also vary depending on the location of activities, peaking for short periods while work is conducted nearest to the boundaries of protected areas and diminishing as it moves further away. Construction related noise levels are exempt from Oregon noise regulations, the following information is provided for reference. The U.S. Federal Highway Administration provides Noise

[13] White River Wildlife Area | ODFW
[14] ODFW Hatchery resiliency

Emission Reference levels for a range of construction equipment[15]. Table 2, below, provides select reference levels for equipment expected to be used during Facility construction. Blasting is not anticipated. Maximum noise is expected from scraping and trenching, both referenced at 89 A-weighted decibels (dBA) 50 feet from the source. Estimated construction noise levels for each area below were developed by utilizing the maximum 89 dBA noise level for any piece of equipment, and accounting for the reduction in noise provided by distance and absorption of sound by the atmosphere[16].

TABLE 2 - CONSTRUCTION EQUIPMENT REFERENCE NOISE LEVELS

Sound Source	**Sound Pressure Level at 50 feet (dBA)[17]**
Auger Drill Rig	85
Backhoe	80
Bar Trencher	89
Dozer	85
Excavator	85
Flatbed Truck	84
Forklift	85
Generator Set	81
Grader	85
Large Crane	83
Loader	85
Pickup Truck/ATV	55
Pile Driver	84
Scraper	89
Trencher	83
Water Truck	80

3.1.1.1 OREGON NATIONAL HISTORIC TRAIL

NHTs are designated to commemorate historic routes of exploration, migration, or cultural significance, and to provide opportunities for recreation. Some segments of the Oregon NHT are accessible through current hiking trails, though this is not the case for the segment nearest to the

[15] 9.0 Construction Equipment Noise Levels and Ranges - Handbook - Construction Noise - Noise - Environment - FHWA
[16] https://www.iso.org/standard/20649.html"ISO 9613-2:1996 - Acoustics — Attenuation of sound during propagation outdoors — Part 2: General method of calculation
[17] An overview of sound from commercial photovoltaic facilities, 2020

site boundary[18], which includes the mapped extent of the trail but is not maintained or otherwise widely accessed by the public. Thus, while Table 1 lists the Oregon NHT as being 2.2 miles from the site boundary, the nearest intact segment of trail, which follows a portion of Barlow Road, is accessible from the Forest Creek campground approximately 8.8 miles from the site boundary. At this distance from the site boundary, construction related noise levels would fall to 0 dBA.

3.1.1.2 WHITE WILD AND SCENIC RIVER

Wild and Scenic Rivers are designated for protection to preserve the free-flowing condition, water quality, and "outstandingly remarkable values" such as scenic, recreational, wildlife, cultural, or geologic features are identified as attributes requiring protection. While construction-related noise would not alter hydrology or water quality, it is assessed here for possible effects on the natural soundscape and visitor experience. Access to the White Wild and Scenic River closest to the site boundary is at Graveyard Butte from White River Crossing Road. This point is approximately 0.45 mile from the nearest construction activity that will occur at the Facility. At this distance, the maximum intermittent noise generated by construction activities is expected to attenuate to below 49 dBA, which is less than that of a dishwasher in an adjacent room[19]. The resulting noise will be temporary in nature and will further attenuate as visitors descend into the river canyon, thus, this level of noise will not significantly impact the protected area.

3.1.1.3 WHITE RIVER WILDLIFE AREA

The White River Wildlife Area was established to provide winter range habitat for black-tailed deer and Rocky Mountain elk, and to minimize crop damage to adjacent private lands from big game. The Wildlife Area spans 30,760 acres from OR 216 in Pine Grove to Friend Road west of Friend, Oregon in fragmented parcels. There is limited public access for recreation and the "primary objective of the area is to benefit the wildlife resource."[20] The Wildlife Area is most often used by the public for hunting elk and deer in the late fall, and experiences existing noise from seasonal recreational vehicle access on roads as well as hunting activity. Construction may result in intermittent high-decibel noise events adjacent to the Wildlife Area. The nearest construction activity is expected to occur approximately 0.3 miles from the Wildlife Area. At this distance, maximum, intermittent noise generated by construction activities is expected to be below 55 dBA, which is below the level of normal conversation. The resulting noise will be temporary in nature and will be further reduced by topography and vegetation. This level of noise, occurring temporarily and intermittently, will not significantly impact wildlife. Given the existing noise, distance and noise attenuation, lack of literature about noise impacts to specific wildlife, and the temporary nature of construction, no significant impacts to the Wildlife Area are anticipated from construction noise[21].

[18] Hike on the Oregon Trail (U.S. National Park Service)
[19] Noise and Vibration Resource Report for Programmatic Environmental Impact Statement on Solar Energy Facilities in Washington State
[20] White River Wildlife Area
[21] Final Order on Application for Site Certificate, 2024

3.1.1.4 LOWER WHITE RIVER WILDERNESS AREA

Wilderness areas emphasize preservation of natural conditions and undeveloped character. Noise intrusion from adjacent construction activities could alter the natural soundscape and impair visitor experience. However, there are no official trails, and only a few short stretches of abandoned roads within the Lower White River Wilderness Area[22]. Thus, the wilderness is little visited, and most people access the White River at the Wilderness Area's western edge at Keeps Mill Campground[23], which is approximately 8.2 miles from the site boundary. At Keeps Mill Campground where the wilderness area is most accessed, construction-related noise would be 0 dBA.

3.1.1.5 DESCHUTES WILD AND SCENIC RIVER AND STATE SCENIC WATERWAY

The Deschutes Wild and Scenic River and State Scenic Waterway are overlapping protected areas approximately 4 miles from the site boundary. State Scenic Waterways, such as Wild and Scenic Rivers, are designated to protect the free-flowing character of the river, as well as scenic and natural values, recreation, and fish and wildlife. While construction-related noise would not alter hydrology or water quality, it has the potential to adversely affect recreational and scenic values by intruding upon the natural soundscape and diminishing visitor experience. At 4 miles from the site boundary, the maximum, intermittent construction noise is expected to attenuate to less than 5 dBA. Construction noise is expected to further attenuate as visitors descend into the river canyon. This level of noise would not be noticeable.

3.1.2 OPERATIONAL NOISE

As described in Section 3.1, above, of the six protected areas in the analysis area likely to experience noise impacts from Facility construction, only three of these protected areas are expected to have measurable noise levels from Facility operation: the White Wild and Scenic River, the White River Wildlife Area, and the Lower White River Wilderness Area. The remaining protected areas within the analysis area are at a distance such that modeled noise levels are near or at 0 dBA (refer to the State and Local Laws and Regulations Exhibit for more information).

Operational noise will be minimal and primarily result in sustained background noise levels from transformers and inverters throughout the Facility, as well as from substation equipment. The State and Local Laws and Regulations Exhibit outlines the existing acoustical environment and anticipated Facility sound levels from operation. To assess potential impacts on the three protected areas listed above, the Applicant modeled operational noise compared to Oregon Department of Environmental Quality's conservative assumed threshold of 36 dBA[24]. Modeled operational noise levels for all three adjacent protected areas are below the Oregon conservative minimum threshold of 36 dBA. Given that all levels are below the conservative threshold and would attenuate with distance, operational noise is not expected to adversely affect the statutory

[22] Lower White River Wilderness Area | Bureau of Land Management
[23] McCubbins Meadow Hike - Hiking in Portland, Oregon and Washington
[24] Operational noise levels may increase ambient statistical noise levels (assumed to be 26 dBA for solar and Wind facilities located on previously unused sites) by 10 dBA. OAR 340-035-0035(1)(b)(B)(iii)

protections or management priorities of any of the protected areas, as described in more detail in the sections below.

3.1.2.1 WHITE WILD AND SCENIC RIVER

In the White Wild and Scenic River, the maximum modeled noise from Facility operation is 29 dBA at the southern edge of the protected area adjacent to the site boundary. This modeled noise level is not expected to measurably alter recreational or scenic values of the river corridor and thus will not impact this protected area.

3.1.2.2 WHITE RIVER WILDLIFE AREA

In the White River Wildlife Area, management priorities focus on maintaining viable wildlife populations and habitat integrity. In the Wildlife Area, the maximum modeled noise level from Facility operation is 29 dBA, which is below the noise thresholds typically associated with wildlife behavior disturbance. Further attenuation from atmosphere, vegetation, and topography is expected, thus operational noise from the Facility is not expected to disrupt wildlife or recreation in this protected area.

3.1.2.3 LOWER WHITE RIVER WILDERNESS AREA

For the Lower White River Wilderness Area, the most sensitive attributes are natural soundscapes and opportunities for solitude. In the Wilderness Area, the maximum modeled noise level from Facility operation is 26 dBA, equivalent to a whisper, and operational noise would attenuate further with distance from the site boundary. Given that the most heavily used access point to the Wilderness Areas is approximately 8 miles from the Facility, this further reduces the likelihood of operational noise impacts to this protected area.

3.2 TRAFFIC IMPACTS

(B) Increased traffic resulting from facility construction or operation;

A traffic study was conducted to review anticipated background and Facility-related traffic volumes and corresponding level of service (LOS) designations (see Attachment 3 of the Public Services Exhibit). Traffic generated by construction would include workforce commuting and truck deliveries of equipment and supplies.

All construction truck traffic is expected to navigate the primary access route to the Facility, via Interstate Highway 84 to southbound U.S. Highway 197 at The Dalles to OR 216. On this route, construction truck traffic would travel adjacent to portions of the White River Wildlife Area, The Deschutes Wild and Scenic River, and cross the White Wild and Scenic River on US 197 northwest of Maupin. Nonetheless, the combination of background growth and Facility construction traffic would result in the same 2027 LOS designations on straight-line road segments as estimated for 2023 for all primary route segments; thus, construction truck traffic will not negatively impact protected areas.

Construction commuting traffic will mostly use the primary access route, but some passenger vehicles may use secondary routes that access US 26. LOS designations for secondary routes do

not change because of estimated commuter traffic for all segments except US 26, northwest of OR 216 (see Figure 1 of Attachment 3 of the Public Services Exhibit). This segment is outside of any identified protected areas. It is approximately 5 miles from segments of the Pacific Crest National Trail, and 4.3 miles from public access to the White Wild and Scenic River at Keeps Mill. The annual average daily traffic levels on this segment of US 26 are projected to be 4,601 in 2027 when Facility impacts are factored in. This number is just over the LOS B threshold of 4,600 and therefore would have a minimal impact, despite the change in LOS designation. Facility-related traffic would not degrade intersection LOS below acceptable levels. Construction commuting traffic is therefore not expected to have a significant impact on protected areas.

During operation, traffic to and from the Facility would consist of daily commutes of up to 20 full-time employees and occasional trips for scheduled inspections and routine maintenance activities. These trips would not meaningfully change traffic volumes on I-84, US 26, US 197, or OR 216; therefore, operational traffic impacts would be negligible.

3.3 WATER USE AND WASTEWATER

(C) Water use during facility construction or operation;

Water during construction will be used for dust control, road compaction, concrete mixing and curing (only if concrete is mixed on site), and worker drinking and sanitation. The Applicant has a will serve letter for municipal water to be provided for construction by Wasco County (see the State and Local Laws and Regulations Exhibit). The Applicant will continue to explore different sources of water for construction to supplement water provided by Wasco County to minimize potential impacts to water resources. These sources may include other municipal supplies, temporary licenses for the duration of construction, a temporary transfer from an existing water right, or exempt wells.

Once constructed, the Facility will require limited water during operation. Water will be used for drinking and sanitation (for approximately 10 to 20 operations and maintenance [O&M] workers) and solar panel washing; the BESS will not require water for operation. During operation, water will likely be supplied by an existing, exempt groundwater well.

More details on permitted water use for construction and operations are provided in the State and Local Laws and Regulations Exhibit.

(D) Wastewater disposal resulting from facility construction or operation;

Construction activities will generate minimal wastewater, primarily sanitary wastewater and wastewater associated with equipment and concrete washing activities (if there are concrete batch plants on site). A licensed subcontractor will provide portable toilets. The construction contractor will ensure that these facilities and disposal of collected sanitary wastewater adhere to applicable regulations. Water loss from construction activities at the Facility will likely occur within or near the site boundary and is expected primarily to occur through evaporation from road compaction and dust control procedures, as well as from mixing and curing concrete. To manage stormwater, the Facility will follow industry-standard best management which will be detailed in the

contractor's Erosion and Sediment Control Plan. Construction activities for the Facility will not discharge water into wetlands, streams, or other waterways.

Water for Facility operations will be minimal; most water required for Facility operation will be for sanitation at the O&M building and for periodic solar panel washing. Wastewater from the O&M building will be discharged to a county-approved septic system. As described in the State and Local Laws and Regulations Exhibit, panel washing will use specialized equipment to minimize water use. Panel washing will not require detergents or other chemicals; water will either evaporate or infiltrate into the ground and will not produce wastewater requiring off-site disposal. While the installation of various components (buildings, foundations, substations, battery containers) increases impervious surface area, the resulting stormwater increase will be negligible and will require only standard design considerations rather than specialized management systems.

The primary type of wastewater generated during Facility decommissioning will be sanitary wastewater, which will be managed following similar protocols to those established during construction, with portable toilets provided for workers and serviced by licensed contractors in accordance with applicable regulations.

The Applicant will ensure that no wastewater is discharged into wetlands, streams, waterways, or other protected areas. Stormwater management will follow strict protocols outlined in the Construction Stormwater Discharge General Permit 1200-C and its associated Erosion and Sediment Control Plan to control stormwater runoff. Refer to Section 2.2 of the Waste Minimization Exhibit for further analysis regarding wastewater at the Facility.

3.4 VISUAL IMPACTS

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

(F) Visual impacts from air emissions resulting from facility construction or operation, including, but not limited to, impacts on Class 1 Areas as described in OAR 340-204-0050.

3.4.1 METHODOLOGY

The Applicant assessed potential visual impacts based on the expected visibility of the above ground features of the Facility from protected areas in the analysis area. To assess visibility, the Applicant conducted a zone of visual influence (ZVI) analysis (commonly referred to as a viewshed analysis or assessment). A ZVI analysis is a GIS assessment that provides a general understanding of areas in a project region from which a proposed project may be visible. The GIS ZVI analysis for the Facility identified areas from which the Facility's aboveground structures may potentially be visible.

A ZVI analysis is an important tool in a visual impact assessment; however, it only illustrates theoretical visibility, and the results should not be interpreted as perceived impacts on their own. There are other factors (e.g., atmospheric conditions, other structures and built features, etc.) that influence the actual visibility of structures on a landscape. The results of the viewshed assessment indicate locations within the analysis area from which the Facility's structures and

other above ground components would potentially be visible. At these locations, the assessment also estimates the percent of potential visibility for each group of structures (e.g., panels, BESS, gen-tie line). Additional details about the ZVI analysis methodology are provided in the Scenic Resources Exhibit.

3.4.2 VISUAL ASSESSMENT RESULTS

Based on the results of this assessment, there will be minimal visibility of the Facility structures from the protected areas in the analysis area, as shown in Attachment 2 (Figures 2A, 2B, and 2C).

Of the 22 protected areas identified in the analysis area, the Facility structures will not be visible from 8 protected areas. Minimal potential visibility of facility components[25] due to topography and the distance that the protected areas are from the Facility. Visual assessment results for the protected areas are summarized in Attachment 1.

Of the protected areas in the analysis area, the White River Wildlife Area has a higher degree of potential visibility, relative to the other protected areas, given its proximity to the northwestern site boundary. For visitors to this Wildlife Area, the Facility structures would not be visible from most (i.e., greater than 70 percent) of the Wildlife Area but the Facility structures would potentially be visible from certain locations in the White River Wildlife Area, especially those areas closest to the site boundary. For this protected area, the management priorities are to maintain viable wildlife populations and habitat integrity. While visual quality contributes to overall landscape condition, viewshed protection is not a central management objective. This protected area serves primarily as rangeland for black-tailed deer and Rocky Mountain Elk and to reduce damage to nearby private croplands, though limited recreation and seasonal road access are also permitted. The management plan for this area does not address scenic opportunities and/or conditions, and the area is not considered an important scenic resource per OAR 345-022-0080(3). Potential visibility of the Facility from some portions of the Wildlife Area would not directly affect wildlife habitat or behavior. Since the resource is protected to provide wildlife habitat, potential visibility of the Facility will not result in potentially adverse impacts.

3.5 OTHER IMPACTS

No other impacts to protected areas are anticipated because of the Facility.

4. MATERIALS ANALYSIS

OAR 345-022-0040(5)(d) A materials analysis, including:
(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;
(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and
(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.

[25] Generally, project components would be visible from less than 2% of each protected area. See the Scenic Resources Exhibit for more information and impact assessment results.

An inventory of industrial materials flowing into and out of the Facility during construction and operation is provided as Tables 1 (Inventory of Construction Materials) and 2 (Inventory of Operational Materials) of the Soil Protection Exhibit. As described in more detail in Section 2.3 of the Soil Protection Exhibit, all potentially hazardous materials stored on site during construction and operation will be managed following strict protocols to safeguard human health and the environment. During construction, fuel storage, if required, will be in secondary containment in designated areas within temporary staging areas. Storage protocols and refueling procedures will be established in the contractors' Spill Prevention, Control, and Countermeasure Plan and all vehicle maintenance will occur offsite. During operation, batteries will be housed in purpose-built, leak-proof enclosures (like shipping containers) and will be inspected regularly by O&M personnel. The O&M building will store limited quantities of maintenance materials (e.g., lubricants, degreasers, herbicides). Storage of maintenance materials will follow manufacturer guidelines and the Spill Prevention, Control, and Countermeasure Plan established for Facility operation. Non-hazardous waste will be managed following standard practices (e.g., solid waste will be stored in conventional waste bins that will be serviced by licensed waste haulers); additional details are provided in Section 2.4 of the Soil Protection Exhibit.

There are no protected areas within the site boundary, therefore there will be no direct material impacts to such resources. The Project's hazardous substances management plan and non-hazardous waste management procedures, as detailed in the Soil Protection Exhibit, will be implemented to prevent any indirect effects on protected areas in the vicinity of the site boundary.

5. CONCLUSION

The analysis of potential impacts on protected areas within the 20-mile analysis area surrounding the Facility site boundary demonstrates that the Facility is consistent with the standards outlined in OAR 345-022-0040. The Facility will have no direct impacts to the inventoried protected areas. Potential indirect impacts from construction and operations—such as noise, traffic, water use, and visual changes—are expected to be minimal due to the distance of protected areas from the site boundary and implementation of avoidance and minimization measures. These include setbacks, water conservation practices, stormwater control under the Construction Stormwater Discharge General Permit 1200-C, secure handling of hazardous materials, and adherence to best management practices throughout the construction, operation, and decommissioning of the Facility.

Based on the results of the noise modeling presented in the State and Local Laws and Regulations Exhibit, operational noise was determined to fall below levels that would cause an impact on protected areas within the analysis area. Construction noise may be audible in six protected areas nearest the Facility; however, construction noise will be short-term and intermittent and will not significantly impact any protected areas based on their protection designations, existing uses, and management criteria.

Construction truck traffic and most construction commuting traffic will use the primary access route to the Facility and though this route goes past some protected areas, construction traffic is

not expected to negatively impact the protected areas. Traffic associated with Facility operation will be negligible and will thus not impact protected areas.

The Applicant anticipates using municipal water from Wasco County for construction but is continuing to explore different sources of water for construction to potentially supplement water from Wasco County to minimize potential impacts to water resources. Once constructed, the Facility will require limited water during operation. Construction activities will generate minimal wastewater, primarily sanitary wastewater and wastewater associated with equipment and concrete washing activities and will not discharge water into wetlands, streams, or other waterways. No impacts to protected areas are anticipated.

Portions of the Facility may be potentially visible from certain locations within the White River Wildlife Area; however, this area is protected to maintain viable wildlife populations and habitat integrity. While visual quality contributes to overall landscape condition, viewshed protection is not a central management objective of the area. Since the resource is protected to provide wildlife habitat, potential visibility of the Facility will not result in potentially adverse impacts.

6. APPROVAL STANDARDS

The Applicant has satisfied the Approval Standards of OAR 345-022-0040, summarized in Table 3.

TABLE 3 APPROVAL STANDARDS MATRIX

Requirement	Handling
OAR 345-022-0040(1) To issue a site certificate, the Council must find:	
(a) The proposed facility will not be located within the boundaries of a protected area designated on or before the date the application for site certificate or request for amendment was determined to be complete under OAR 345-015-0190 or 345-027-0363;	Section 2
(b) The design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to a protected area designated on or before the date the application for site certificate or request for amendment was determined to be complete under OAR 345-015-0190 or 345-027-0363.	Section 3
2) Notwithstanding section (1)(a), the Council may issue a site certificate for: (a) A facility that includes a transmission line, natural gas pipeline, or water pipeline located in a protected area, if the Council determines that other reasonable alternative routes or sites have been studied and that the proposed route or site is likely to result in fewer adverse impacts to resources or interests protected by Council standards; or (b) Surface facilities related to an underground gas storage reservoir that have pipelines and injection, withdrawal or monitoring wells and individual wellhead equipment and pumps located in a protected area, if the Council determines that other alternative routes or sites have been studied and are unsuitable.	The Facility is not located within a protected area, therefore this section does not apply.
3) The provisions of section (1) do not apply to: (a) (a) A transmission line routed within 500 feet of an existing utility right-of-way containing at least one transmission line with a voltage rating of 115 kilovolts or higher; or	The Project is not a routed within 500 feet of an existing utility right-of-way, therefore

	this section does not apply.
(b) A natural gas pipeline routed within 500 feet of an existing utility right of way containing at least one natural gas pipeline of 8 inches or greater diameter that is operated at a pressure of 125 psig.	The Project is not a natural gas pipeline, therefore this section does not apply.
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.	This section is not applicable.
OAR 345-022-0040(5) To assist the Council in determining whether the standard outlined in (1) through (4) has been met, the Applicant must submit information about the potential impacts of the proposed facility on protected areas in the analysis area, providing evidence to support a finding by the Council as required by this rule, including:	
(a) A list of all protected areas within the analysis area identifying: (A) The distance and direction of the protected area from the proposed facility (B) The basis for protection by reference to a specific subsection of OAR 345-001-0010(26); and	Attachment 1
(C) The name, mailing address, phone number, and email address of the land management agency or organization with jurisdiction over the protected area.	Attachment 2
(b) A map showing the location of the proposed facility in relation to the protected areas listed in OAR 345-022-0040 (Protected Areas) located within the analysis area;	Attachment 3
(c) A description of significant potential impacts of the proposed facility, if any, on the protected areas including, but not limited to, potential impacts such as:	
(A) Noise resulting from facility construction or operation;	Section 3.1
(B) Increased traffic resulting from facility construction or operation;	Section 3.2
(C) Water use during facility construction or operation;	Section 3.3
(D) Wastewater disposal resulting from facility construction or operation;	Section 3.3
(E) Visual impacts of facility structures or plumes, including, but not limited to, changes in landscape character or quality; and	Section 3.4
(F) Visual impacts from air emissions resulting from facility construction or operation, including, but not limited to, impacts on Class 1 Areas as described in OAR 340-204-0050.	Section 3.4
(d) A materials analysis, including:	Section 4

(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation; (B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and (C) (C) The applicant's plans to manage non-hazardous waste materials during construction and operation.	

ATTACHMENT 1 PROTECTED AREAS INVENTORY, VISUAL AND NOISE ASSESSMENT RESULTS

Type	Area Name	Distance to site boundary (miles)	Direction from Facility	Gen-tie line Visibility	Solar Array Visibility	Visual Analysis Results	Operational Noise Potential
National Parks OAR 345-022-0040(1)(a)	Oregon National Historic Trail	2.5 miles	N	Yes	Yes	Negligible to minor impacts, potential visibility of solar panels and gen-tie line from certain areas. However, there are not formalized recreation opportunities along the portion of the trail that crosses the analysis area.	No
Wilderness Areas OAR 345-022-0040(1)(c)	Lower White River Wilderness Area	0.1 miles	NW	Yes	Unlikely	Minor impacts, some potential viewing from specific areas along the rim of the canyon generally representing less than 15 percent of the total acreage of the area. Canyon terrain and viewing angles from within the river will generally block visual impacts.	Not to exceed background levels (26 decibels)
	Badger Creek Wilderness	8.1 miles	NW	Yes	Yes	Limited visibility, primarily of panels, at elevated locations. Distance from Facility results in negligible impacts.	No
	Salmon-Huckleberry Wilderness	19.2 miles	W	No	No	Distance and topography generally block views.	No
	Mt. Hood Wilderness	14.3 miles	NW	Unlikely	Unlikely	Minimal views, primarily of panels, in small portions of southernmost area.	No
Wild, Scenic, or Recreational River included in the National Wild and Scenic River System OAR 345-001-0010(26)(d)	East Fork Hood Wild and Scenic River	17.2 miles	NW	No	No	Distance and topography generally block views.	No
	White Wild and Scenic River	0.4 miles	N	Unlikely	Unlikely	Negligible viewing opportunities from the portion of the river in the analysis area. The terrain and viewing angles from within the canyon will generally block views.	Not to exceed maximum allowable levels (36 decibels)

Type	Area Name	Distance to site boundary (miles)	Direction from Facility	Gen-tie line Visibility	Solar Array Visibility	Visual Analysis Results	Operational Noise Potential
	Fifteen-mile Creek Wild and Scenic River	15.4 miles	N	Unlikely	Unlikely	Minimal views in small portions of southernmost area.	No
	Deschutes Wild and Scenic River	4 miles	E	Unlikely	Unlikely	Negligible viewing opportunities from the portion of the river in the analysis area. The terrain and viewing angles from within the canyon will generally block views.	No
	Salmon Wild and Scenic River	17.2 miles	NW	No	No	Distance and topography generally block views.	No
National Wildlife Refuge included in the National Wildlife Refuge System OAR 345-001-0010(26)(e)	None	-	-	-	-	-	-
National Fish Hatcheries OAR 345-001-0010(26)(f)	None	-	-	-	-	-	-
National Recreation area, National Scenic area, or Special Resources Management Unit OAR 345-001-0010(26)(g)	Mount Hood National Recreation Area	14.8 miles	NW	Unlikely	Unlikely	Minimal views in small portions of southernmost area.	No
	Badger Creek National Recreation Area	8.2 miles	N	Yes	Yes	Limited visibility, primarily of panels, at elevated locations. Distance from Facility results in negligible impacts.	No
Wilderness Study Area OAR 345-001-0010(26)(h)	None	-	-	-	-	-	-
Area of Critical Environmental Concern OAR 345-001-0010(26)(i)(A)	None	-	-	-	-	-	-
Outstanding Natural Area OAR 345-001-0010(26)(i)(B)	None	-	-	-	-	-	-

Type	Area Name	Distance to site boundary (miles)	Direction from Facility	Gen-tie line Visibility	Solar Array Visibility	Visual Analysis Results	Operational Noise Potential
Research Natural Area OAR 345-001-0010(26)(i)(C)	Gumjuwac-Tolo Research Natural Area	13.5 miles	NW	Yes	Yes	Limited visibility, primarily of panels, at elevated locations. Distance from Facility results in negligible impacts.	No
Experimental Forest or Range OAR 345-001-0010(26)(i)(D)	Happy Ridge Hazard Experimental Research Area	9.5 miles	N	Yes	Yes	Project potentially visible from some locations within the Research Area, though limited.	No
Special Interest Area designated for scenic, geologic, botanic, zoologic, paleontological, archaeological, historic, or recreational values, or combinations of these values OAR 345-001-0010(26)(i)(E)	Pacific Crest National Trail	19.7 miles	W	No	No	Distance and topography generally block views.	No
State park, wayside, corridor, monument, historic, or recreation area under the jurisdiction of the Oregon Parks and Recreation Department OAR 345-001-0010(26)(j)	White River Falls State Park	11 miles	NE	No	No	Topography generally blocks views.	No
	Barlow Creek Campground	15.6 miles	NW	No	No	Distance and topography generally block views.	No
Willamette River Greenway OAR 345-001-0010(26)(k)	None	-	-	-	-	-	-
Natural area listed in the Oregon Register of Natural Areas OAR 345-001-0010(26)(l)	Tygh Valley (White River Falls) State Natural Area	11 miles	NE	No	No	Topography generally blocks views.	No
South Slough National Estuarine Research Reserve OAR 345-001-0010(26)(m)	None	-	-	-	-	-	-
State Scenic Waterway OAR 345-001-0010(26)(n)	Deschutes River State Scenic Waterway	4 miles	E	Unlikely	Unlikely	Negligible viewing opportunities from the portion of the river in the analysis area. The terrain and viewing angles from within the canyon will generally block views.	No

Type	Area Name	Distance to site boundary (miles)	Direction from Facility	Gen-tie line Visibility	Solar Array Visibility	Visual Analysis Results	Operational Noise Potential
State Wildlife Refuge or Management Area OAR 345-001-0010(26)(o)	White River Wildlife Area	0.1 miles	NW	Yes	Yes	The Facility structures will potentially be visible from about 28 percent of the protected area within the analysis area.	Not to exceed maximum allowable levels (36 decibels)
Fish hatchery operated by the Oregon Department of Fish and Wildlife OAR 345-001-0010(26)(p)	Oak Springs Hatchery	10.6 miles	NE	No	No	Distance and topography generally block views.	No
	Warm Springs National Fish Hatchery	15 miles	S	No	No	Distance and topography generally block views.	No
Agricultural experiment station, experimental area, or research center established by Oregon State University OAR 345-001-0010(26)(q)	None	-	-	-	-	-	-
Research forest established by Oregon State University OAR 345-001-0010(26)(r)	None	-	-	-	-	-	-

Note: gen-tie line visibility includes supporting substation, switchyard, and pole components.

ATTACHMENT 2 PROTECTED AREAS MANAGEMENT CONTACT INFORMATION

Type	Area Name	Address	Phone	Email
National Parks OAR 345-022-0040(1)(a)	Oregon National Historic Trail	"National Trails Office - Regions 6, 7, 8 Oregon National Historic Trail 1100 Old Santa Fe Trail Santa Fe, NM 87505"	541-523-1843	BLM_OR_NH_Mail@blm.gov
Wilderness Areas OAR 345-022-0040(1)(c)	Lower White River Wilderness Area	BLM Prineville District Office 3050 N.E. 3rd Street Prineville, OR 97754	(541) 416-6700	blm_or_pr_mail@blm.gov
	Badger Creek Wilderness	USFS Barlow Ranger District 780 NE Court St Dufur, OR 97021	(541) 467-2291	-
	Salmon-Huckleberry Wilderness	USFS Zigzag Ranger District 70220 E Highway 26 Zigzag, OR 97049	(503) 622-3191	-
	Mt. Hood Wilderness	USFS Hood River Ranger District 6780 Highway 35 Parkdale, OR 97041	(541) 352-6002	-
Wild, Scenic, or Recreational River included in the National Wild and Scenic River System OAR 345-001-0010(26)(d)	East Fork Hood Wild and Scenic River	USFS Barlow Ranger District 780 NE Court St Dufur, OR 97021	(541) 467-2291	-
	White Wild and Scenic River	BLM Prineville District Office 3050 N.E. 3rd Street Prineville, OR 97754	(541) 416-6700	blm_or_pr_mail@blm.gov
	Fifteen-mile Creek Wild and Scenic River	USFS Barlow Ranger District 780 NE Court St Dufur, OR 97021	(541) 467-2291	-
	Deschutes Wild and Scenic River	BLM Prineville District Office 3050 N.E. 3rd Street Prineville, OR 97754	(541) 416-6700	blm_or_pr_mail@blm.gov

Type	Area Name	Address	Phone	Email
	Salmon Wild and Scenic River	BLM Northwest Oregon District, 1717 Fabry Rd, SE Salem, Oregon, 97306	(503) 375-5646	BLM_OR_NO_Mail@blm.gov
National Recreation area, National Scenic area, or Special Resources Management Unit OAR 345-001-0010(26)(g)	Mount Hood National Recreation Area	USFS Hood River Ranger District 6780 Highway 35 Parkdale, OR 97041	(541) 352-6002	-
	Badger Creek National Recreation Area	USFS Barlow Ranger District 780 NE Court St Dufur, OR 97021	(541) 467-2291	-
Research Natural Area OAR 345-001-0010(26)(i)(C)	Gumjuwac-Tolo Research Natural Area	USFS Barlow Ranger District 780 NE Court St Dufur, OR 97021	(541) 467-2291	-
Experimental Forest or Range OAR 345-001-0010(26)(i)(D)	Happy Ridge Hazard Experimental Research Area	-	-	-
Special Interest Area designated for scenic, geologic, botanic, zoologic, paleontological, archaeological, historic, or recreational values, or combinations of these values OAR 345-001-0010(26)(i)(E)	Pacific Crest National Trail	BLM Medford District Office 3040 Biddle Road Medford, Oregon, 97504	541-618-2200	BLM_OR_MD_Mail@blm.gov
State park, wayside, corridor, monument, historic, or recreation area under the jurisdiction of the Oregon Parks and Recreation Department OAR 345-001-0010(26)(j)	White River Falls State Park	Oregon Parks and Recreation Department 725 Summer Street NE, Suite C Salem, OR 97301	(800) 551-6949	katie.gauthier@oprd.oregon.gov
	Barlow Creek Campground	USFS Hood River Ranger District 6780 Highway 35 Parkdale, OR 97041	(541) 352-6002	-

Type	Area Name	Address	Phone	Email
Natural area listed in the Oregon Register of Natural Areas OAR 345-001-0010(26)(l)	Tygh Valley (White River Falls) State Natural Area	Oregon Parks and Recreation Department 725 Summer Street NE, Suite C Salem, OR 97301	(800) 551-6949	katie.gauthier@oprd.oregon.gov
State Scenic Waterway OAR 345-001-0010(26)(n)	Deschutes River State Scenic Waterway	Oregon Parks and Recreation Department 725 Summer Street NE, Suite C Salem, OR 97301	(800) 551-6949	katie.gauthier@oprd.oregon.gov
State Wildlife Refuge or Management Area OAR 345-001-0010(26)(o)	White River Wildlife Area	White River Wildlife Area 78430 Dodson Road Tygh Valley, OR 97063	(541)544-2126	-
Fish hatchery operated by the Oregon Department of Fish and Wildlife OAR 345-001-0010(26)(p)	Oak Springs Hatchery	Oak Springs Hatchery 85001 Oak Springs Road Maupin, OR 97037	(541) 395-2546	oak.springs.hatchery@state.or.us
	Warm Springs National Fish Hatchery	1 Fish Hatchery Road Warm Springs, OR 97761	(541) 553-1692	cheri_anderson@fws.gov

Notes: BLM = Bureau of Land Management, USFS = US Forest Service, ”-“ indicates data not available.

ATTACHMENT 3 FIGURES

Figure 1 – Analysis Area

Figure 2A – Solar Panel VSA

Figure 2B – BESS VSA

Figure 2C – Gen-tie Utility VSA

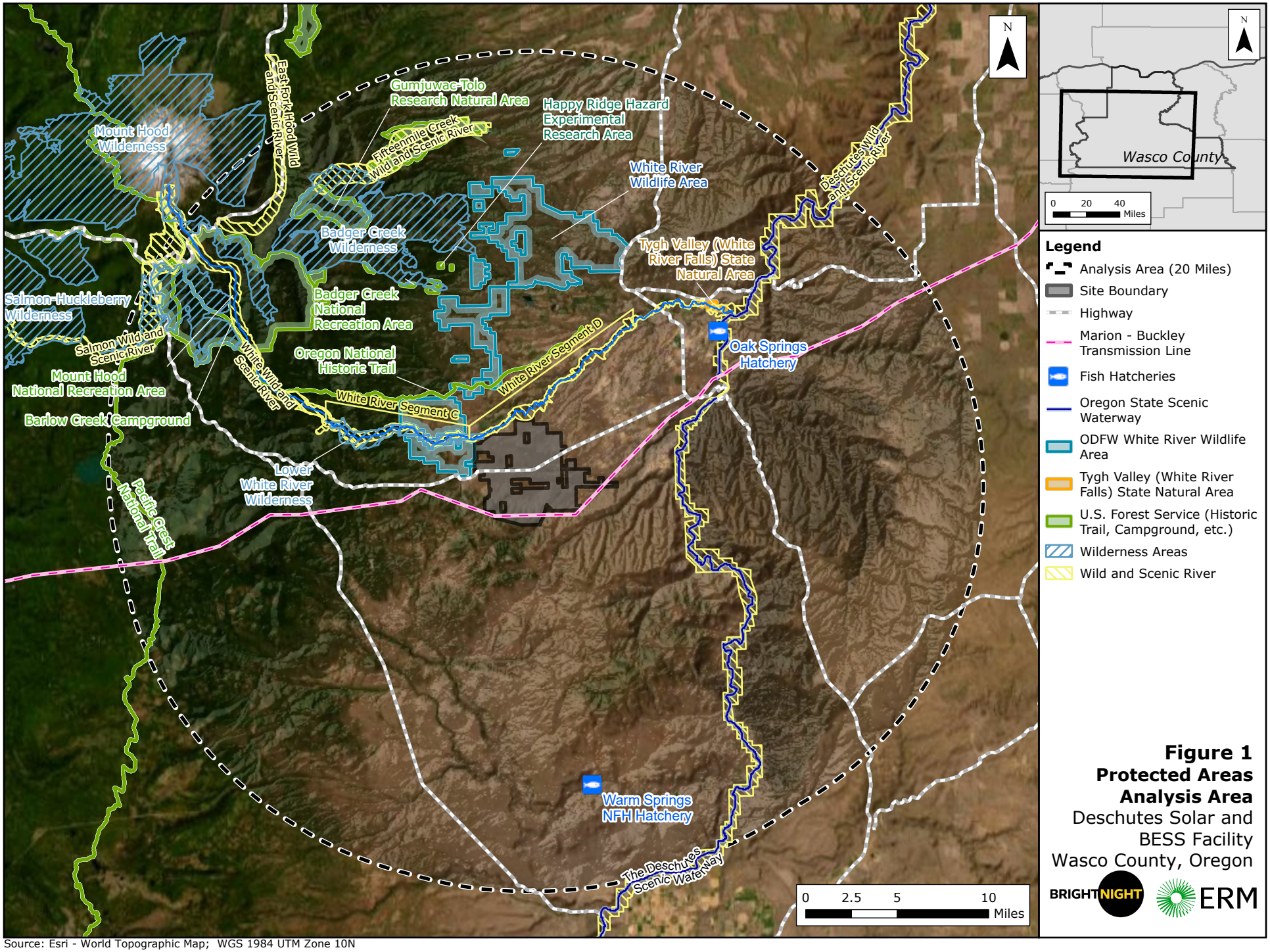

Figure 1
Protected Areas
Analysis Area
Deschutes Solar and BESS Facility
Wasco County, Oregon

BRIGHTNIGHT ERM

Source: Esri - World Topographic Map; WGS 1984 UTM Zone 10N

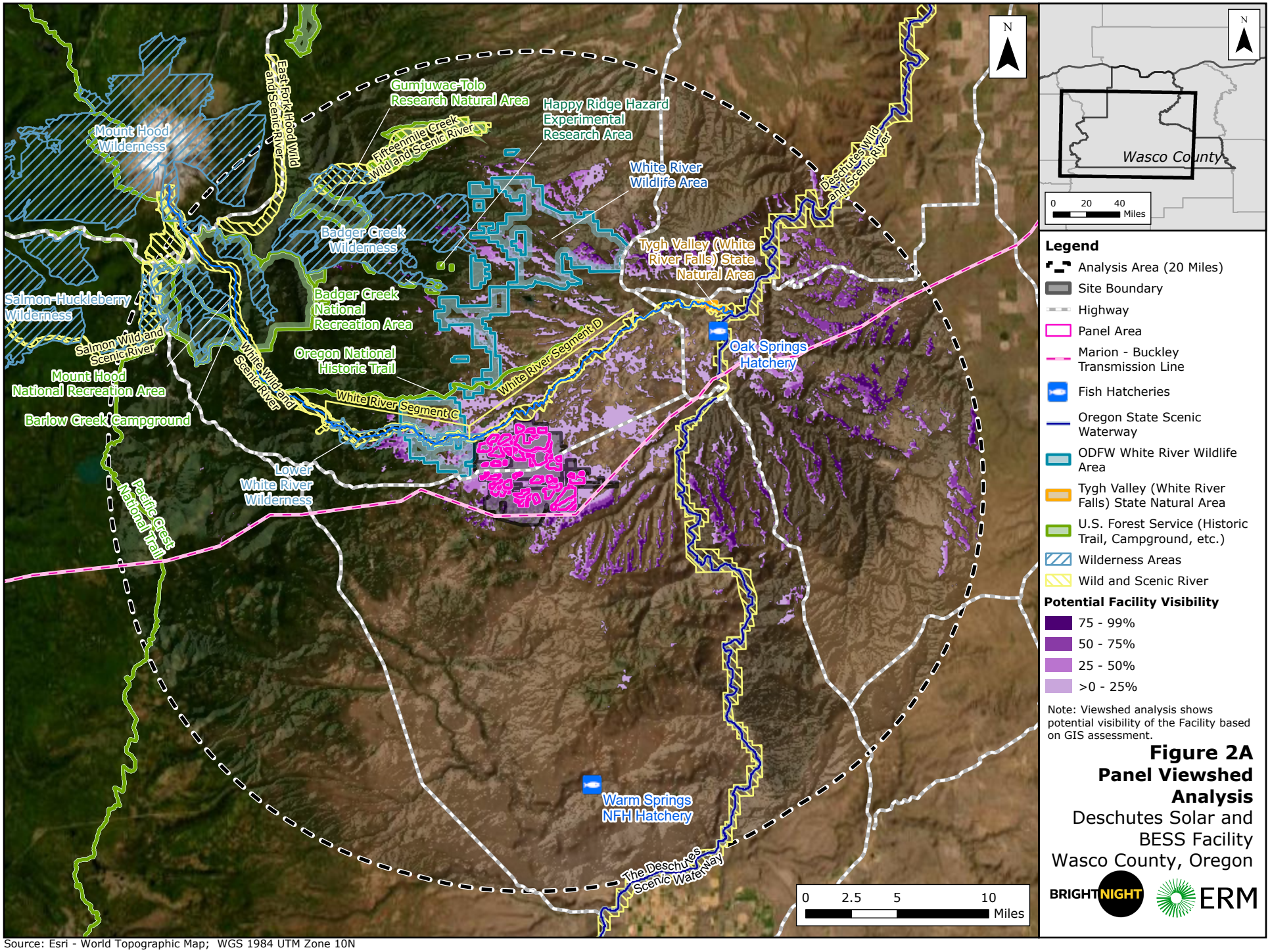

Figure 2A
Panel Viewshed Analysis
Deschutes Solar and BESS Facility
Wasco County, Oregon

BRIGHTNIGHT ERM

Source: Esri - World Topographic Map; WGS 1984 UTM Zone 10N

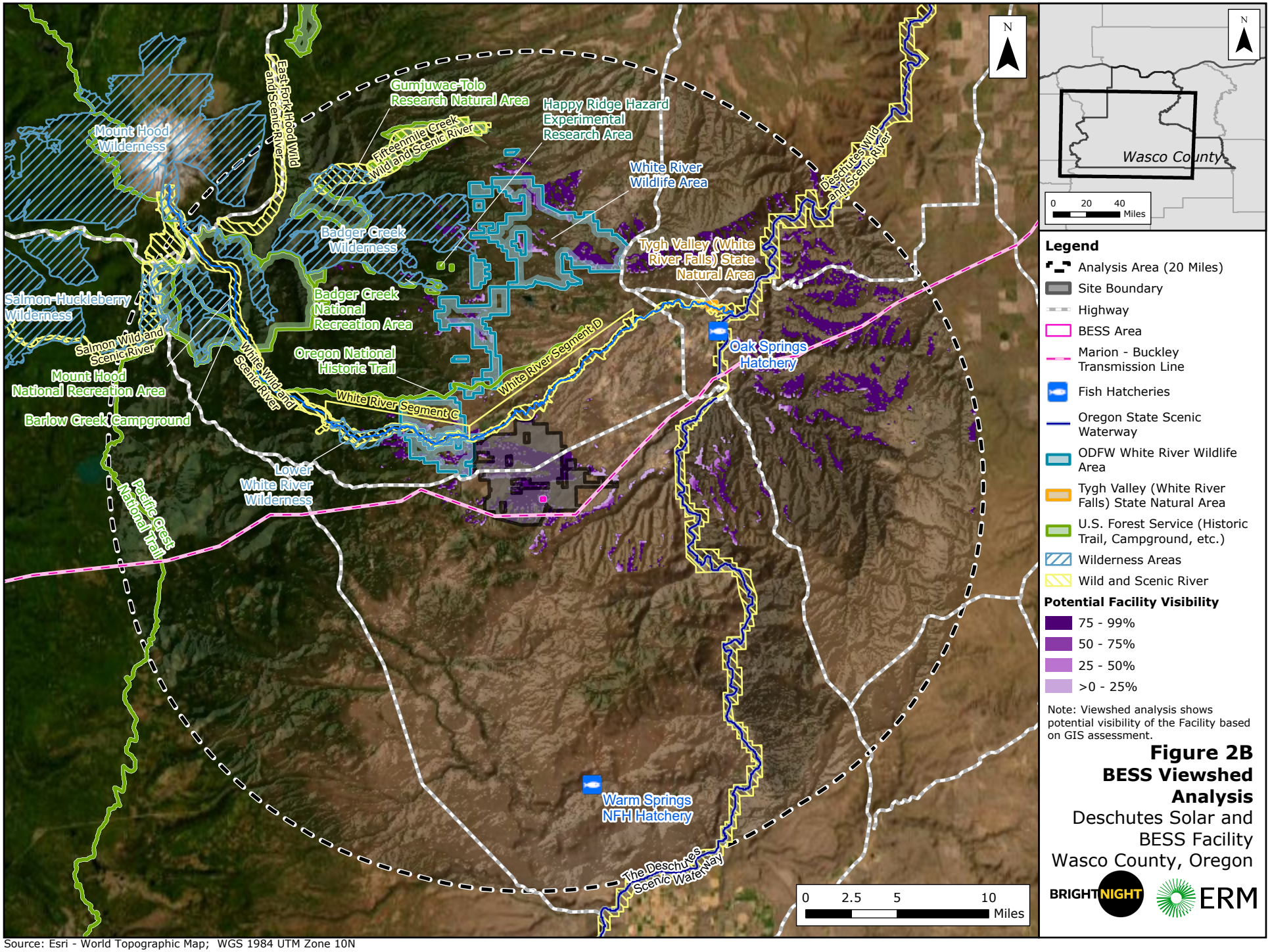

Figure 2B
BESS Viewshed Analysis
Deschutes Solar and BESS Facility
Wasco County, Oregon

BRIGHTNIGHT ERM

Source: Esri - World Topographic Map; WGS 1984 UTM Zone 10N

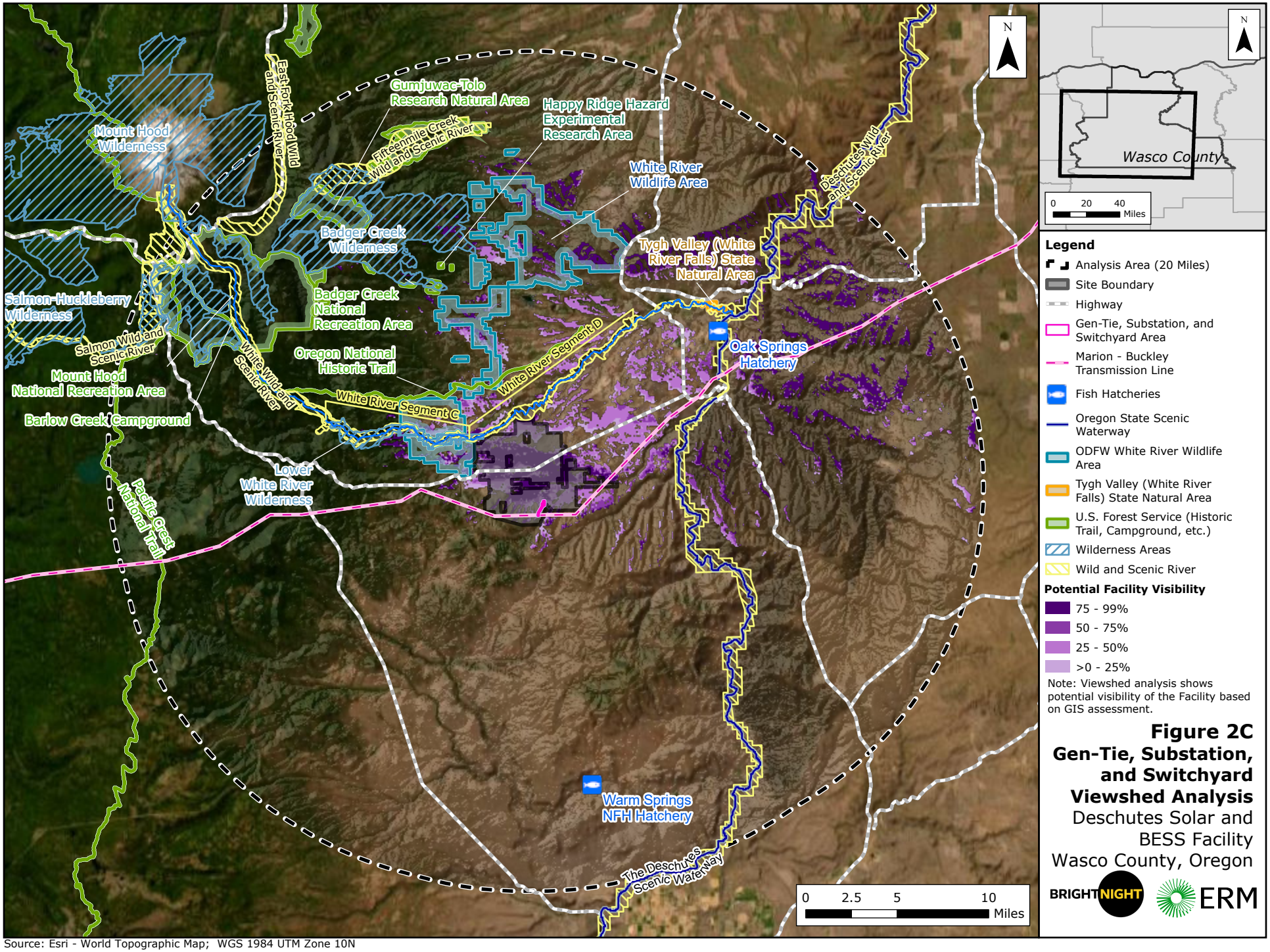

Figure 2C
Gen-Tie, Substation, and Switchyard Viewshed Analysis
Deschutes Solar and BESS Facility
Wasco County, Oregon

BRIGHTNIGHT ERM

Source: Esri - World Topographic Map; WGS 1984 UTM Zone 10N