Scenic Resources Exhibit

PREPARED FOR

DATE
December 2025

REFERENCE
Oregon Energy Facility Siting Council

CONTENTS

LIST OF TABLES

ACRONYMS AND ABBREVIATIONS

Acronym	Description
Applicant	DECH bn, LLC
BESS	Battery energy storage system
BLM	Bureau of Land Management
DSM	Digital surface model
GIS	Geographic information system
LRMP	Land and Resource Management Plan
mph	Miles per hour
MWh	Megawatt hours
NPS	National Park Service
ODFW	Oregon Department of Fish and Wildlife
OR 216	Oregon Highway 216
ORV	Outstandingly remarkable value
SMS	Scenery Management System
USFS	USDA Forest Service
VMS	Visual Management System
WSR	Wild and Scenic River
ZVI	Zone of visual influence

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 (MW) of solar capacity and a battery energy storage system (BESS) with up to 4,000 megawatt hours (MWh) storage capacity. This Scenic Resources Exhibit has been prepared to meet the standard in OAR 345-022-0080.

2. ANALYSIS AREA

The analysis area for scenic resources includes the site boundary and the area within 10 miles of the site boundary (Figure 1). While the site boundary was used to establish the analysis area, the visual impact assessment on important or significant scenic resources within the analysis area is based on the preliminary Facility layout within the site boundary. The location of Facility components may change in the final design with further avoidance and minimization micrositing measures; however, the layout assessed represents the worst-case scenario for evaluating potential visual impacts from the Facility. The layout represents a worst-case scenario because the assumed height estimates for all Facility components were conservative. The Facility components may be shorter than what was assessed but would not be taller than what was assessed – for example, the analysis assumed a conservative height for the solar panels at full tilt, but for most of the time the Facility is operating, the panels will be lower, and thus less visible. The analysis also assumed panels throughout the entire solar array area; however, this layout is conservative and represents the maximum possible extent of panels. The actual footprint of the panels may decrease relative to what was assessed but would not increase (i.e., panels will not be placed closer to OR 216 than what was evaluated in this analysis).

3. IDENTIFICATION OF SIGNIFICANT OR IMPORTANT SCENIC RESOURCES

Per OAR 345-022-0080(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.*

This section documents the inventory of scenic resources identified as significant or important in local, tribal, and/or federal land management plans within the analysis area. Potential scenic resources within the analysis area were identified through desktop research of available information, including:

- Publicly available Geographic Information Systems (GIS) data on recreation sites, other protected areas, communities, and other areas with potential scenic resource protections or management guidance including US Geological Service (USGS; USGS 2025a; USGS 2025b),

Bureau of Land Management (BLM; BLM n.d.a; BLM n.d.b), and Oregon Parks and Recreation Department (OPRD; OPRD 2024);

- Google Maps (2024); and
- Internet sites of government agencies in the analysis area with potential scenic resource management responsibilities and corresponding planning documents.

The locations of significant/important scenic resources within the analysis area are shown on Attachment 1, Figure 1. The Applicant then reviewed available comprehensive planning and informational documents for these potentially significant or important scenic resources. The list of reviewed plans included the following:

- City of Maupin Comprehensive Land Use Plan Update (City of Maupin 2006)
- Comprehensive Management and Use Plan and Final Environmental Impact Statement for the Oregon, California, Mormon Pioneer, and Pony Express National Historic Trails (NPS 1993)
- Confederated Tribes of Warm Springs Organic Documents
- Lower Deschutes Management Plan and Record of Decision (BLM 1993)
- Mt. Hood National Forest Land and Resource Management Plan (USFS 1990)
- White River Wildlife Area Visitors' Guide (ODFW 2024)
- Wasco County 2040 Comprehensive Plan (Wasco County 2024)
- White River National Wild and Scenic River Management Plan (USFS 1994)

A summary of the plans is provided in Table 1. Of the eight plans reviewed (listed above and in Table 1), there were two plans that identified scenic resources within the plan documents: the Mt. Hood National Forest Land and Resource Management Plan (USFS 1990) and the Wasco County 2040 Comprehensive Plan (Wasco County 2024). There were three plans that did not specifically reference scenic resources; however, scenery is listed as a criterion or an outstanding and remarkable value. In total, there are five planning documents that identified the five important scenic resources, which are described and evaluated in the following sections.

TABLE 1 COMPREHENSIVE PLANNING DOCUMENTS AND IDENTIFIED SCENIC RESOURCES IN THE ANALYSIS AREA

Plan	Jurisdiction	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resources Identified in Analysis Area (Y/N)	Name of Scenic Resource in Analysis Area	Plan Reference
Municipalities					
Comprehensive Land Use Plan Update (2006)	City of Maupin	N	N	No specific City-managed scenic resources; however, the Comprehensive Land Use Plan does identify the Deschutes River as both a federal Wild and Scenic River and a State Scenic Waterway. The Deschutes Wild and Scenic River is addressed in the Lower Deschutes River Management Plan and Record of Decision listed below.	Natural Resources, Scenic and Historic Areas, and Open Spaces
Counties					
Wasco County 2040 Comprehensive Plan (2022)	Wasco County	Y	Y	The 2040 Comprehensive Plan references the 1983 version of the plan that identifies county designated scenic resources, including OR 216, which generally bisects the analysis area from Warm Springs Junction (US 26) to its junction with US 197 (the Dalles-California Highway). Other than OR 216, there are no other specific County-managed scenic resources. However, the Comprehensive Plan does identify Federal Wild and Scenic Rivers/Oregon Scenic Waterways, including:	Goal 5: Open Spaces, Scenic and Historic Area and Natural Resources

Plan	Jurisdiction	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resources Identified in Analysis Area (Y/N)	Name of Scenic Resource in Analysis Area	Plan Reference
				• White River Wild and Scenic River (USFS) • Lower Deschutes Wild and Scenic River (BLM and Oregon) These Wild and Scenic Rivers are addressed in their respective planning documents listed below.	
State					
White River Wildlife Area Management Plan (2018)	Oregon Department of Fish and Wildlife	N	N	None	None
Tribes					
Organic Documents[1]	Confederated Tribes of Warm Springs	N	N	None	None
Federal					
Lower Deschutes River Management Plan and Record of Decision (1993)	Bureau of Land Management	N	Y	No specific scenic resources are identified, but scenery is one of the outstandingly remarkable values of the Lower Deschutes River.	No specific scenic component
Oregon National Historic Trail Management and Use Plan Update and Final Environmental	National Park Service	N	Y	No specific scenic resources are identified, but scenery is one of the criteria of trails designated under the National Trails System Act.	No specific scenic component

Plan	Jurisdiction	Scenic Resources Specified in Plan (Y/N)	Important or Significant Scenic Resources Identified in Analysis Area (Y/N)	Name of Scenic Resource in Analysis Area	Plan Reference
Impact Statement (1999)					
Land and Resource Management Plan Mt. Hood National Forest (1990)	US Forest Service	Y	Y	Designated Wilderness Areas: • Badger Creek Wilderness Area • Lower White River Wilderness Area Wild and Scenic Rivers: • White Wild and Scenic River	Chapter 2 – Visual Resource section Chapter 4 – Visual Resource Management section
White River National Wild and Scenic River Management Plan (1994)	US Forest Service	N	Y	No specific scenic resources are identified, although scenery is one of the outstandingly remarkable values of the White River.	Chapter 2 Outstandingly Remarkable Values and Desired Future Condition

[1] The Confederated Tribes of Warm Springs' Organic Documents include the Treaty of 1855, tribal constitution and bylaws, corporate charter, and others. While these documents do not address scenic resources, the Applicant acknowledges the importance of scenic values of resources of concern to the Confederated Tribes of Warm Springs. Resources of concern are addressed in the Historic, Cultural, and Archaeological Resources Exhibit and through outreach and coordination with the Confederated Tribes of Warm Springs. The Applicant met with representatives of the Confederated Tribes of the Warm Springs Reservation on 27 August 2025. During the meeting, the Applicant shared preliminary results of the viewshed analysis and committed to continued conversation and coordination with the Confederated Tribes of the Warm Springs Reservation on the preliminary site layout throughout the permitting process to minimize impacts to Tribal scenic resources.

3.1 WASCO COUNTY 2040 COMPREHENSIVE PLAN

Wasco County in northcentral Oregon extends from the Columbia River in the north to the Jefferson County boundary in the south. It has a population of approximately 27,052 residents as of 2023 (Portland State University 2023). The Facility is entirely within the boundaries of the County. The 2040 Comprehensive Plan provides policy guidance for "growth, development, services, and resource management" in the County (2024). Per the Statewide Panning Goals, the County addresses scenic resources in Goal 5 of the Comprehensive Plan. Goal 5 (Natural Resources, Scenic and Historic Areas, and Open Spaces) aims "to protect natural resources and conserve scenic and historic areas and open spaces." Under Goal 5 (presented in Chapter 5 of the Comprehensive Plan), there are several policies that specifically identify and address scenic resources in the County including federal Wild and Scenic Rivers, Oregon Scenic Waterways, and scenic views and sites, some of which are in the analysis area.

The White and Deschutes Wild and Scenic Rivers are specifically identified in the Comprehensive Plan (note, the Deschutes River is also acknowledged as an Oregon Scenic Waterway). Both rivers are addressed separately below under their respective management plans.

The Comprehensive Plan also notes that while the White River and the designated Wild and Scenic River corridor are managed by the federal government, the County has also adopted an Overlay Zone "that requires all permitted uses be treated as a conditional use." For practical purposes, the Overlay Zone allows the County to prohibit uses and activities within the Overlay Zone except as permitted with "additional standards and analysis." The Applicant evaluates the applicability of the White River Overlay Zone to the Facility in the Land Use Exhibit and demonstrates that the Overlay Zone is not applicable because no Facility elements will be located within the Overlay Zone boundaries.

The scenic views and areas identified under the County's 1983 Comprehensive Plan, as referenced in the current plan, include OR 216 from mile post 0.00 (junction of Warm Springs Highway/US 26) to mile post 26.17 (junction of The Dalles-California Highway/US 197). Approximately 24 miles of OR 216 are in the analysis area, including about 5.2 miles that bisect the site boundary. This stretch of OR 216 is described as a scenic area "within view" without further detail as to the scenic value associated with the area. The are no designated pullouts or parking areas along the OR 216 in this area from which a person could safely stop and get out of their car, as such, "within view" is interpreted to mean within the driver's view.

3.2 LOWER DESCHUTES RIVER MANAGEMENT PLAN

The BLM's Lower Deschutes River Management Plan (BLM 1993) provides resource management direction for the Lower Deschutes Wild and Scenic River (WSR). The Lower Deschutes WSR was designated as a Recreational WSR in 1988 in part because of its outstandingly remarkable scenic values[1]. The 100-mile designated segment begins below the Pelton Regulating Reservoir and continues downriver to the confluence with the Columbia River; about 21 miles of the river are in

[1] It was previously designated as an Oregon Scenic Waterway in 1970.

the analysis area. The river is approximately 3.2 miles to the east of the site boundary at its closest point and generally follows a north-south orientation through the analysis area.

The river runs through a deep canyon that ranges from 900 feet to 2,600 feet in depth with most public recreational activities, access points and developed use areas (e.g., campgrounds, day use areas, trails), and facilities within the canyon. From within the canyon, the topography encloses views and blocks outward views of the regional landscape. The designated WSR corridor also includes lands along the edge of the canyon, 7,088 acres of which are in the analysis area that are administered by the BLM's Prineville District Office as part of the Wild and Scenic River designation. There are no developed or designated recreational or public use facilities in this area.

The outstandingly remarkable values (ORVs) of the Lower Deschutes WSR include botany, fish, geology, history, prehistory, recreation, scenery, and wildlife. The Lower Deschutes River Management Plan guides the protection and enhancement of these ORVs. While scenery is an identified ORV, the River Management Plan does not specifically identify or address scenic resources within the WSR corridor. The Lower Deschutes WSR is addressed in Section 4 below as it is considered a significant or important scenic resource.

3.3 OREGON NATIONAL HISTORIC TRAIL MANAGEMENT AND USE PLAN UPDATE AND FINAL ENVIRONMENTAL IMPACT STATEMENT

The Oregon Trail is a 2,170-mile trail that spans six states and was designated in 1978 as a National Historic Trail. The NPS (Long Distance Trails Office) is responsible for management and administration of the trail even though it primarily passes through lands under the jurisdiction of other federal agencies (e.g., BLM, USFS). The approximate alignment of the Oregon National Historic Trail (ONHT) is about 2 miles to the north of the site boundary across a mix of private and public lands that sit 50 to more than 800 feet in elevation higher than the Facility. Slightly more than 17 miles of the ONHT approximate alignment are in the analysis area.

The Management and Use Plan Update and Final Environmental Impact Statement provides direction and management guidance for the ONHT (NPS 1993). While the protection of scenic resources is a key factor along nationally designated trails, the Management and Use Plan for the ONHT does not identify specific scenic resources or values associated nor does it provide guidance for the continued management of scenic resources within the OHNT approximate alignment corridor. The segment of the trail to the north of the site boundary does not appear to have any intact portions or other types of public access or recreational opportunities that may also be associated with the presence of important scenic resources and/or associated scenic protections. The ONHT is within the analysis area, however, and so is addressed below in Section 4.

3.4 MT. HOOD NATIONAL FOREST LAND AND RESOURCE MANAGEMENT PLAN

The Mt. Hood National Forest encompasses 1.1 million acres, some of which are within the analysis area (49,698 acres). The closest National Forest lands (part of the White River Wild and Scenic Corridor) are about 0.5-mile to the west/northwest of the site boundary. All USFS lands are subject to scenic resource management per the USFS' Scenery Management System (SMS)

whether or not they have a specific scenic-related designation. Designated areas that have scenic value in the Mt. Hood National Forest and within the analysis area include the Lower White River and Badger Creek Wilderness Areas, and the White River Wild and Scenic River (the White River WSR is discussed separately in Section 3.5). The Badger Creek Wilderness area is nearly 10 miles to the north of the site boundary. This area is densely forested, which constrains panoramic views of the regional landscape. The Lower White River Wilderness Area extends more than 8 miles along the White River immediately west of the site boundary (portions of the Wilderness Area are co-managed by the BLM). Most of the recreational use of this area is focused on and along the river. The White River canyon topography encloses views and generally blocks outward views toward the broader landscape.

The Land and Resource Management Plan (LRMP) guides USFS activities and establishes management standards and guidelines on the Mount Hood National Forest (USFS 1990) including for these designated areas (a separate River Management Plan also helps direct management of the Lower White River Wild and Scenic River, see Section 3.5 below). All three of these resources are considered significant or important scenic resources for purposes of this Exhibit.

The LRMP also addresses scenic resource management through the application of the USFS' SMS (note: SMS replaced the Visual Management System, which was in place during development of the Mt. Hood LRMP). The USFS uses the SMS to guide management decisions regarding scenic quality on all USFS lands. Using this system, all lands are given a classification based on natural variety, public sensitivity, and other visual characteristics. Designated Wilderness Areas, WSRs, and other designated features (e.g., National Recreation Trails, National Scenic Areas) within the Mt. Hood National Forest are classified with the highest level visual quality objective (preservation) while most other lands have a classification of "partial retention" or "modification." In the analysis area, the Lower White River and Badger Creek Wilderness Areas carry a VMS classification of "preservation." The VMS classification along the White Wild and Scenic River is based on the designation of individual river segments (see Section 3.5).

3.5 WHITE RIVER WILD AND SCENIC RIVER MANAGEMENT PLAN

The White River was designated as a WSR in 1988 and is managed by the USFS and BLM. It was designated based on the following ORVs: geology, hydrology, botany, fish, wildlife, historic resources, recreation, and scenic resources. It flows from west to east within the analysis area through a deep canyon that sits about 500 feet lower than the Facility. The northern side of the site boundary follows and abuts the WSR corridor in several areas. Like the Lower Deschutes Wild and Scenic River, most public recreational activities, access points, and facilities associated with the White Wild and Scenic River are within the canyon; however, the designated corridor also includes lands along the edge of the canyon. The canyon, like others in the region (e.g., Deschutes), is narrow and deep. This type of topography encloses views from the river and generally limits outward views.

The White River, from its headwaters to the confluence with the Deschutes River, is split into six segments (lettered 'A' through 'F'). Segments C (USFS managed) and D (BLM managed), adjacent to the northern site boundary, are within the analysis area, carry a scenic WSR designation, have

a VMS classification of "retention" (foreground views) or "partial retention" (middle ground views), and as such are considered significant or important scenic resources. The River Management Plan identifies two outstanding viewsheds in the analysis area, Keeps Mill Overlook (Segment C) and Graveyard Butte (Segment D). These two locations are both within the river canyon and while they are identified in the River Management Plan (i.e., labeled on a map) - there are no formal public use facilities (e.g., parking, trails, interpretive signage) at either site. Per the River Management Plan, the views at these locations are oriented into the river canyon and not the broader regional landscape. Attachment 1, Figure 1 shows Segments C and D and the two identified viewsheds in the analysis area. Keeps Mill Overlook is approximately 6 miles from the site boundary and Graveyard Butte is approximately 1 mile from the site boundary.

From the five plans summarized above, there are six scenic resources that were evaluated for potential adverse impacts. The impact assessment methodology and results are described in Section 4 below.

4. IMPACT ASSESSMENT

Applicable OAR 345-022-0080(5)(d) requirements:

> *(C) A description of significant potential adverse impacts to the scenic resources identified in subsection (a), including, but not limited to:*
>
> > *(A) Loss of vegetation or alteration of the landscape as a result of construction or operation;*
> >
> > *(B) Visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality; and*
> >
> > *(C) Loss of visibility due to air emissions or other pollution resulting from the construction or operation of the proposed facility;*

4.1 IMPACT ASSESSMENT METHODOLOGY

Scenic resources capture the combination of natural landforms, vegetation, water features, and human modifications (including cultural/historic features) that characterize and contribute to a landscape's visual quality. Impacts on scenic resources occur when the visual character of the landscape (environment) is changed (BLM 1984, USFS 1995). Impacts on scenic resources are based in part on the anticipated visibility of a project, as well as expected changes to the predominant landscape characteristics (e.g., form, line, color, texture) of an area.

To identify potential scenic impacts, the Applicant identified existing conditions, used an Esri GIS software package to assess the expected visibility of the Facility, and considered the types of anticipated visual changes from the Facility on existing scenic conditions. Existing scenic conditions were based on available physiographic information and photographs of the area around the Facility, while future conditions (changes in existing scenic conditions) were estimated based on similar types of projects in similar types of environments. Visibility was assessed through GIS-assisted modeling of the Facility and the corresponding identification of nearby areas within the analysis area from which the Facility would potentially be visible.

This type of assessment, commonly referred to as a viewshed analysis, is a GIS assessment that provides a general understanding of areas in a project region from which a proposed project may be visible (this type of assessment is sometimes referred to as a Zone of Visual Influence assessment). A viewshed analysis is an important tool in a visual impact assessment, however, it only illustrates potential visibility, and the results should not be interpreted as perceived impacts on their own.

The viewshed analysis for the Facility identified areas from which the Facility's primary aboveground structures may potentially be visible in the analysis area. These structures include the solar panels, BESS, and generation tie (gen-tie), switchyard, and substation. These structures were included in the assessment since they represent the most likely Facility structures to be visible on the landscape based on their mass and height.

The Applicant prepared the viewshed analysis using a Digital Surface Model (DSM). This type of model incorporates not only the earth's surface (bare earth model), but also objects that are on it (e.g., vegetation, buildings, etc.). For this assessment, the Applicant specifically used the following sources of information to build the DSM and corresponding viewshed analysis:

1. A Digital Elevation Model derived from National Elevation Dataset 1/3rd Arc-Second from the United States Geological Survey.
2. Vegetation extents from the European Space Agency data and Vegetation height data incorporated from the US Department of Agriculture/US Department of Interior's Landfire layer.
3. Sample focal points to represent the primary above ground Facility structures including:
    a. 1,170 sample focal points within the solar array area to simulate the maximum possible extent of the solar panels with an assumed maximum panel height of 11 feet (3.7 meters) above the ground[2];
    b. 200 sample focal points within the BESS area to simulate the possible extent of the BESS units with an assumed height of 9.5 feet (2.9 meters) above the ground; and
    c. 35 sample focal points within the locations for the substation, switchyard and along the generation tie (gen-tie) line to simulate Facility equipment with heights ranging from 28 feet (8.5 meters) to 95 feet (29.0 meters).

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).

[2] The panel height is a conservative estimate representing the maximum possible height of the panels at full tilt.

4.2 IMPACT ASSESSMENT RESULTS

4.2.1 EXISTING SCENIC CHARACTERISTICS

The Facility is on a broad plain that extends east from the foothills of the Cascade Mountains. This area is near the transition of the Cascade-Sierra and Columbia Plateau physiographic provinces (NPS 2017). The Columbia Plateau is characterized by broad, flat plateaus that are incised by deep river canyons. Grass and shrublands cover the flat to rolling topography. The prominent, steep river canyons add bold vertical dimensions and coarse textures to the landscapes in this province. While the area around the Facility shares the typical visual characteristics of the Columbia Plateau province, it also provides views of the broader landscape including the taller peaks (e.g., Mt. Hood) and forested ridgelines of the Cascade-Sierra province to the west.

The specific visual setting within and adjacent to the site boundary includes natural grasslands, agricultural fields, residential and agricultural structures, high voltage transmission lines and distribution lines, and individual tress and clusters of trees and shrubs. Hills, ridgelines, and mountain peaks enclose the broad plateau and provide vertical context in the distance. The existing landscape is characterized by the following visual elements (based on Google Earth imagery and available photographs from various vantage points in the analysis area):

- Forms
  - Simple, flat, rolling (plateau topography) to long, vertical, rounded to jagged (foothills and mountains)
  - Amorphous, pyramidal, vertical, patchy (vegetation)
  - Smooth, regular, low, linear, geometric (residential and agricultural buildings, road, distribution lines)
- Lines
  - Weak, flat to bold, undulating (topography)
  - Simple, soft, vertical (vegetation)
  - Bold, continuous, straight, short, vertical, horizontal, diagonal, repetitive (built environment)
- Colors
  - Tan, brown (topography)
  - Subtle, desaturated, green, tan, and brown hues (vegetation)
  - Black, brown, white, red, yellow (built environment)
- Textures
  - Fine to medium, smooth, sparse, continuous (topography)
  - Fine to coarse, smooth, patchy, dotted, stippled (vegetation)
  - Smooth, continuous, sparse, scattered, stippled (built environment)

4.2.2 VISIBILITY AND FUTURE CONDITIONS

In general, perceived landscape changes generally diminish with increased viewing distances (BLM 1986). Landscape changes are typically most perceptible in the foreground (0 to 0.5 mile) and middle ground (0.5 to 5 miles). At these viewing distances, viewers can distinguish individual forms, lines, colors, and textures. At longer distances (background; more than 5 miles), individual landscape elements may be less perceptible and harder to distinguish. For example, lower profile solar arrays may be visible at distances of more than 10-miles; however, while viewers may perceive the massing of facilities on the landscape (i.e., they notice a contrast between built structures and the surrounding landscape), they are not able to identify the changes on the landscape specifically as a solar facility (Sullivan et al. 2012). Figure 2A (solar panels), Figure 2B (BESS), and Figure 2C (gen-tie including the substation and switchyard) display potential Facility visibility within the analysis area.

The Facility adds varying heights of new infrastructure to the landscape. The solar panels, BESS, and gen-tie (including substation and switchyard) would have varying magnitudes of visibility within the analysis area. The solar panels would have the greatest potential visibility because of the area within the site boundary over which they may be installed. However, their low profile (maximum height of 11 feet at maximum tilt) will help minimize their contrast with the existing landscape especially when viewed from greater distances. When viewed from the middle or background, the solar arrays may add straight, continuous, horizontal, dark lines across the landscape (based on a review of other built solar facilities in similar landscapes). The short gen-tie line will also have a high degree of visibility because of the height of the structures (maximum 95 feet) but visibility will be limited given its proximate location to existing high-voltage transmission lines. Consequently, considering the visual characteristics of similar types of structures that already exist on the landscape, the gen-tie will comprise a relatively small addition of repetitive, tall, vertical lines to the landscape, and these elements will be confined to a small area at the southeastern end of the site boundary. The BESS will have the least potential visibility because of its small footprint, location within the site boundary, and low height. These structures will also create short, horizontal lines across a portion of the landscape.

Overall, based on preliminary Facility design and other existing solar projects within similar landscape settings as examples, the Facility's structures may add the following elements to the landscape:

- Low, repetitive, geometric blocks
- Straight, flat, vertical and horizontal lines
- Monotone, cool, gray, black, and metallic colors
- Striated, matte finish, smooth textures

While some of these elements currently exist, the Facility would increase their prevalence on the landscape. The potential visibility of these new structures and associated landscape elements would largely depend on distance from the Facility (i.e., viewing distance), as well as topography and existing screening features (e.g., trees, buildings, etc.).

Clearing and grading of some areas within the site boundary will be required to facilitate construction of the Facility (e.g., solar panels, gen-tie, access roads, battery storage, substation, etc.). Site preparation and grading will be limited in scope and will not substantially change or modify the existing landforms throughout the site boundary and will retain vegetation, particularly along OR 216, to the extent possible. The Facility's major and supporting facilities, including solar arrays, will be constructed and operated on the cleared and graded areas, which will obscure most changes in vegetative cover and modifications to existing landforms within the site boundary. Additionally, compared to clearing and grading, the new facilities will be more prominent from a visibility perspective. The new facilities will not generate emissions plumes and so no visual impacts from plumes are expected. Similarly, the Facility will not create new air emissions or other pollution that would potentially impact visibility in the area.

The solar panels are designed to absorb rather than reflect light, therefore minimizing glare from the panels. The Applicant completed a glint and glare study, and the results are provided in the Public Services Exhibit as Attachment 5 showing that any glare from the Facility would be like that of a water body.

The relatively flat topography of lands within the site boundary and adjacent areas likely make the Facility's structures most visible in the fore (0 to 0.5 mile) and middle ground (0.5 to 5 miles), although there are several background areas from which the Facility may also be visible in the analysis area. In the middle and background (over 5 miles), areas of potential visibility tend to be on low ridges, hills, and other elevated positions (Figures 2A, 2B, and 2C). Based on the viewshed analysis, the percentages of the analysis area from which the Facility structures would potentially be visible in the analysis area (note, the analysis area includes all lands within the established 10-mile scenic resources analysis area including areas that are not identified as significant or important) include:

- Solar panels – 17.3 percent
- BESS – 4.3 percent
- Gen-tie (including substation and switchyard) – 14.1 percent

Table 2, Table 3, and Table 4 provide specific results from the viewshed analysis for the potential visibility of the Facility's solar panels, BESS, and gen-tie line (including the substation and switchyard), respectively, from the identified important scenic resources (Section 3).

Overall, while the Facility components will be visible from many of the identified important scenic resources in the analysis area, they will only be visible from a small percentage of the total area of these resources. As noted previously, while the Facility would potentially be visible from these important scenic resources, actual visibility and any corresponding changes to scenic conditions (i.e., impact) would be dependent on location specific conditions at the important scenic resource including intervening topography, vegetation, and other screening elements of the landscape.

TABLE 2 POTENTIAL VISIBILITY OF THE SOLAR ARRAYS AT IMPORTANT SCENIC RESOURCES IN THE ANALYSIS AREA

Important Scenic Resource	Total Acreage of the Scenic Resource within the Analysis Areas	Area of Potential Visibility (Percent)[a]				
		0-25%	25-50%	50-75%	75-100%	Total
OR 216 (Wasco County)	173	20.0%	13.8%	<0.1%	0%	33.9%
Lower Deschutes Wild and Scenic River (BLM)	7,088	<0.1%	<0.1%	0.0%	0.0%	<0.2%
Oregon National Historic Trail (NPS)	22	8.0%	0.1%	0.0%	0.0%	8.1%
Badger Creek Wilderness Area (USFS)	1,090	1.9%	3.4%	0.5%	2.3%	8.2%
Lower White River Wilderness Area (USFS + BLM)	2,873	6.6%	2.9%	1.2%	0.1%	10.8%
White Wild and Scenic River (USFS + BLM)	6,329	2.6%	0.1%	0.1%	<0.1%	2.8%

[a] Area of potential visibility is the estimated percent of each important scenic resource from which varying amounts of the Facility components would potentially be visible.

TABLE 3 POTENTIAL VISIBILITY OF THE BESS AT IMPORTANT SCENIC RESOURCES IN THE ANALYSIS AREA

Important Scenic Resource	Total Acreage of the Scenic Resource within the Analysis Areas	Area of Potential Visibility (Percent)[a]				
		0-25%	25-50%	50-75%	75-100%	Total
OR 216 (Wasco County)	173	0.9%	0.7%	0.4%	9.10%	11.1%
Lower Deschutes Wild and Scenic River (BLM)	7,088	0.0%	0.0%	0.0%	0.0%	0.0%
Oregon National Historic Trail (NPS)	22	0.0%	0.0%	0.0%	0.0%	0.0%
Badger Creek Wilderness Area (USFS)	1,090	0.4%	0.4%	0.5%	5.4%	6.7%
Lower White River Wilderness Area (USFS + BLM)	2,873	0.2%	0.2%	0.2%	0.0%	2.5%
White Wild and Scenic River (USFS + BLM)	6,329	0.0%	0.0%	0.0%	0.2%	0.2%

[a] Area of potential visibility is the estimated percent of each important scenic resource from which varying amounts of the Facility components would potentially be visible.

TABLE 4 EXTENT OF POTENTIAL VISIBILITY OF THE GEN-TIE AT IMPORTANT SCENIC RESOURCES IN THE ANALYSIS AREA

Important Scenic Resource	Total Acreage of the Scenic Resource within the Analysis Areas	Area of Potential Visibility (Percent)[a]				
		0-25%	25-50%	50-75%	75-100%	Total
OR 216 (Wasco County)	173	5.6%	11.4%	5.9%	11.3%	34.3%
Lower Deschutes Wild and Scenic River (BLM)	7,088	<0.1%	<0.1%	0.0%	0.0%	<0.2%
Oregon National Historic Trail (NPS)	22	1.2%	3.7%	0.9%	0.1%	5.8%
Badger Creek Wilderness Area (USFS)	1,090	0.3%	0.3%	0.4%	6.2%	7.2%
Lower White River Wilderness Area (USFS + BLM)	2,873	1.7%	1.0%	0.2%	0.2%	5.2%
White Wild and Scenic River (USFS + BLM)	6,329	0.5%	0.4%	0.0%	0.2%	1.1%

[a] Area of potential visibility is the estimated percent of each important scenic resource from which varying amounts of the Facility components would potentially be visible.

4.2.3 OR 216

Within the analysis area and as shown on Figures 2A and 2B, the solar panels and gen-tie will not be visible from most (i.e., 66 percent) of the OR 216 highway corridor within the analysis area; however, there would be potential visibility of both the solar panels and gen-tie from approximately 34 percent of the OR 216 highway corridor within the analysis area (Table 2 and Table 3). The BESS would not be visible from almost 90 percent of the OR 216 highway corridor within the analysis area but would be potentially visible along approximately 11 percent of the OR 216 highway corridor in the analysis area (Figure 2C and Table 4). Where the Facility is potentially visible, much of the potential visibility along OR 216 will be foreground views (up to 0.5 mile from the viewer). Given the layout of the Facility, the panels will be the closest structures to OR 216 and will fall within the foreground. As noted previously, where visible, the panels will add geometric forms, horizontal and vertical lines, and muted hues (gray, black) to the landscape and will likely result in higher levels of visual contrast compared to more distant views (e.g., middle and background).

Views from OR 216 are anticipated to be dynamic[3] because there are no pull-offs or parking areas along OR 216 in the analysis area. Views for motorists traveling along the highway would therefore be affected by their movement, speed, and direction of travel. This movement influences the field of view and sensitivity of drivers. As noted by the Federal Highway Administration, faster speeds result in smaller areas of focus for drivers (FHWA 2015). At 65 miles per hour (mph), this reduces a typical view angle from approximately 124 degrees (normal cone of vision from a fixed position) to 40 degrees. Along OR 216 with a speed limit of 55 mph, the reduction in the typical view angle for a motorist likely constrains their view to the road and a portion of the wider road corridor compared to a more panoramic view of the broader landscape. The speed of travel also affects potential visibility of the Facility by decreasing the duration during which a motorist or passenger would potentially be exposed to views of the Facility. For a driver traveling 55 mph, the Facility will be visible for approximately 7 minutes traveling west to east and slightly more than 8 minutes traveling east to west, compared to nearly 30 minutes to travel the full length of the highway designated as scenic.

Overall, the potential for adverse effects to scenic conditions is greatest along the OR 216 corridor where Facility components are sited in the foreground (within 0.5 mile of the highway), which accounts for less than a quarter (i.e., 23.7 percent) of the highway designated as a scenic area. The Facility components will add new forms, lines, colors, and textures to the landscape that will result in moderate to major levels of contrast or change. Since OR 216 is a designated scenic area, viewer sensitivity to changes in landscape characteristics is likely moderate to high; however, it is important to note that there is already existing development along OR 216 within the analysis area so the Facility will not be the only development within view. Examples of existing development along OR 216 within the analysis area include high-voltage transmission lines, a salvage yard, stockpiled gravel/aggregate, and a gas station. This combination of visibility, degree of change, and viewer sensitivity would result in moderate impacts on the scenic resource values

[3] Dynamic views are characterized by movement while static views are from a fixed location.

associated with OR 216 in the analysis area because there will be some portions of OR 216 (i.e., 34 percent) where the Facility is visible but there will also be sections of OR 216 (i.e., 66 percent) where the Facility will not be within view.

The Applicant proposes avoidance, minimization, and mitigation measures in Section 5 to ensure that the potential adverse impact from the Facility on scenic resource qualities of OR 216 are not significant.

4.2.4 LOWER DESCHUTES WILD AND SCENIC RIVER

The results of the viewshed analysis (Figures 2A, 2B, and 2C) indicate that no locations on the river or in the canyon would have potential visibility of any of the Facility's structures or components. As noted in Table 2 through 4, there may be some elevated points along the canyon rim within the WSR corridor where certain Facility features would potentially be visible, but these locations appear to be extremely limited based on the viewshed analysis (less than 1 percent of the designated WSR corridor would have potential visibility of one or more Facility components). Given the lack of visibility from the river canyon and very limited visibility from some areas along the canyon rim, impacts on scenic resources in the Lower Deschutes WSR within the analysis area would be negligible.

4.2.5 OREGON NATIONAL HISTORIC TRAIL

There would be minimal potential viewing opportunities of the Facility from some locations along the ONHT (Figures 2A, 2B, and 2C). The viewshed analysis indicates that there would be potential visibility of the solar panels from approximately 8 percent of the trail corridor within the analysis area (Table 2). Additionally, the gen-tie, including structures in the substation and switchyard, would also potentially be visible from a small area (less than 6 percent) of the trail corridor (Table 4). The results of the viewshed analysis indicate that the BESS structures would not be visible from any stretch of the ONHT within the analysis area (Table 3). In total, while there would be some potential visibility of Facility components, no adverse impacts to scenic conditions along the ONHT are anticipated. This is due to the limited nature of potential viewing opportunities, viewing distances (the panels would be in the middle to background, and the gen-tie would be in the background), and intervening topography and vegetation, which will help to minimize any potential contrast from the new structures on the landscape.

4.2.6 MT. HOOD NATIONAL FOREST

Significant scenic resources within the Mt. Hood National Forest include the Badger Creek Wilderness Area, the Lower White River Wilderness Area, and the White Wild and Scenic River. Visual impacts on these scenic resources are described in the sections below.

4.2.6.1 BADGER CREEK WILDERNESS AREA

According to the results of the viewshed analysis (Figure 2A, 2B, and 2C), there would be some potential visibility of the Facility from the Badger Creek Wilderness Area. The solar panels would account for the greatest amount of potential visibility (Table 2). The areas from which the Facility would potentially be visible are primarily elevated locations that may provide broader landscape

viewing opportunities. However, given the distance from and intervening topography and vegetation, any potential visibility is not anticipated to result in adverse impacts to the scenic conditions of the wilderness area.

4.2.6.2 LOWER WHITE RIVER WILDERNESS AREA

The results of the viewshed analysis (Figures 2A, 2B, and 2C) indicate that no locations on the river or in the canyon would have potential visibility of any of the Facility. However, since the boundary of the wilderness area extends beyond the canyon rim in several areas (the closest area is about 1-mile west of the site boundary), there may be some potential visibility of Facility structures in these locations. These locations appear to be limited based on the viewshed analysis and generally account for about 10.8 percent or less of the wilderness area (Table 2). Dense tree cover along the rim of the canyon may help minimize any potential views of Facility structures. Given the lack of visibility from the river canyon and limited visibility from areas along the canyon rim, there would be no adverse impacts to the scenic conditions of the White River Wilderness Area.

4.2.6.3 WHITE WILD AND SCENIC RIVER

For the White River WSR, there would be no visibility of the Facility's structures and components from within the canyon (Figure 2A, 2B, and 2C). There may be some points along the canyon rim accounting for about 3 percent of the designated Wild and Scenic Corridor where certain Facility features would potentially be visible (Table 2 through 4), but these locations appear to be extremely limited based on the viewshed analysis. Because of the lack of visibility from the river canyon and very limited visibility from some areas along the canyon rim, there would be no adverse impacts to the scenic conditions of the White River WSR from construction and operation of the Facility.

5. AVOIDANCE, MINIMIZATION AND MITIGATION MEASURES

OAR 345-022-0080(5)(f) requires:

> *A description of measures the applicant proposes to avoid, reduce or otherwise mitigate any potential significant adverse impacts.*

Of the six important or significant scenic resources within the analysis area, the Facility will have no or negligible potential impacts on five resources and moderate potential impacts on one resource (OR 216). OR 216 is a scenic area "within view" meaning the land that a viewer can see when driving along OR 216. Because OR 216 does not have any pull outs or parking areas within the analysis area, "within view" will be limited to what someone can see from a car traveling along OR 216.

The Applicant proposes the following avoidance and minimization measures to ensure that the Facility's potential impacts to OR 216 as a scenic resource are less than significant.

Avoidance Measures:

- There will be no Facility development on the northern side of OR 216 within an approximately 0.5 mile stretch of OR 216 on the eastern side of the site boundary, thus avoiding any Facility visibility in this area.
- Facility collector lines will be buried rather than overhead, wherever possible, thus avoiding visibility of collector lines.

Minimization Measures:

- The Facility components (e.g., solar panels, BESS, substation, gen-tie) will be developed on less than half of the Facility site boundary thus minimizing the visual impact of the Facility.
- Rather than developing the Facility with one large area of panels, the solar panels will be developed in 46 blocks ranging in size from approximately 25 acres to 440 acres. These blocks will be separated by avoidance areas where there will not be Facility development, thus breaking up and minimizing the visual impacts of the solar panels.
- The solar panels will be strategically setback from OR 216 a minimum of 200 feet from the right of way and existing topography and distance will be used to minimize visibility and visual contrast of Facility components from drivers on OR 216. The solar array will have the minimum setback of 200 feet on both sides of the highway right of way in only two small areas. Generally, the fence line will be setback the minimum 200 feet only on one side of the highway with a greater setback applied to the opposite side of the highway. For over 3 miles of OR 216 that pass through the site boundary, the fence line is set back greater than 200 feet on both sides of the highway right of way thus minimizing visibility of the panels in the foreground. Additionally, the solar array will be set back greater than 0.5-mile from the right of way on at least one side of the highway for at least 2 miles (i.e., approximately 40 percent) of the approximately 4.8 miles of OR 216 that go through the site boundary, thus avoiding visibility of panels in the foreground in these areas.
- The BESS, substation, and gen-tie will be in the southern portion of the site boundary, greater than 1.5 miles from OR 216, thus minimizing the visibility of these Facility components from OR 216.
- The Applicant will maintain existing vegetation, including trees, to the extent possible along the public right of way of OR 216 to offer visual buffering between the highway and the Facility. There are approximately 160 trees within the OR 216 right of way that the Applicant plans to retain. These trees will offer some screening of the solar panels, thus minimizing their visibility.
- Solar modules will be installed with antireflective coating to minimize the potential for glare.
- The Applicant may create low berms in areas between the solar array area and the OR 216 right of way to mimic existing natural undulations in the landscape and increase screening of Facility components from drivers on OR 216.
- Permanent Facility lighting will be dark sky friendly – the Facility will only be lit as needed, lighting will be controlled, and lights will have down shields to limit off-site lighting.
- The operations and maintenance and other support buildings will be painted in a low-reflectivity, neutral color to blend with the surrounding landscape.

- Signage will be limited to those signs needed for manufacturer or installer identification, appropriate warning signs, or owner identification.

5.1 MONITORING

OAR 345-022-0080(5)(g) requires:

> *The applicant's proposed monitoring program, if any, for impacts to scenic resources.*

A monitoring program for visual resources is not proposed since construction and operation of the Facility will generally not result in widespread significant direct or indirect impacts to scenic resources in the analysis area.

6. CONCLUSION

This Exhibit addresses the required information pursuant to OAR 345-022-0080(5)(a) through (g). As documented in the Exhibit, the design, construction, and operation of the Facility will not result in significant direct or indirect impacts to scenic resources. Therefore, the Facility complies with OAR 345-022-0080.

7. APPROVAL STANDARDS

The Applicant has satisfied the standards for the Scenic Resources Exhibit outlined in OAR 345-022-0080. Approval standards are summarized in Table 5.

TABLE 5 APPROVAL STANDARDS MATRIX

Approval Standard	Handling
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.	Sections 3.0 – 6.0
(2) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). 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	-

Approval Standard	Handling
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.	
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 under 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;	Section 3
(b) A map or maps showing the location of the scenic resources described under subsection (a), in relation to the site of the proposed facility;	Section 3
(c) A description of the methodology the applicant used to identify and assess potential visual impacts to the scenic resources identified in subsection (a);	Section 3
(d) Identification of potential visual impacts to the scenic resources identified in subsection (a), including, but not limited to:	Section 4
(A) Loss of vegetation or alteration of the landscape as a result of construction or operation;	Section 4
(B) Visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality; and	Section 4
(C) Loss of visibility due to air emissions or other pollution resulting from the construction or operation of the proposed facility;	Section 4
(e) An assessment of the significance of the visual impacts described under subsection (d);	Section 4
(f) The measures the applicant proposes to avoid, reduce or otherwise mitigate any significant adverse impacts.	Section 5
(g) The applicant's proposed monitoring program, if any, for impacts to scenic resources.	Section 6

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ATTACHMENT 1 FIGURES

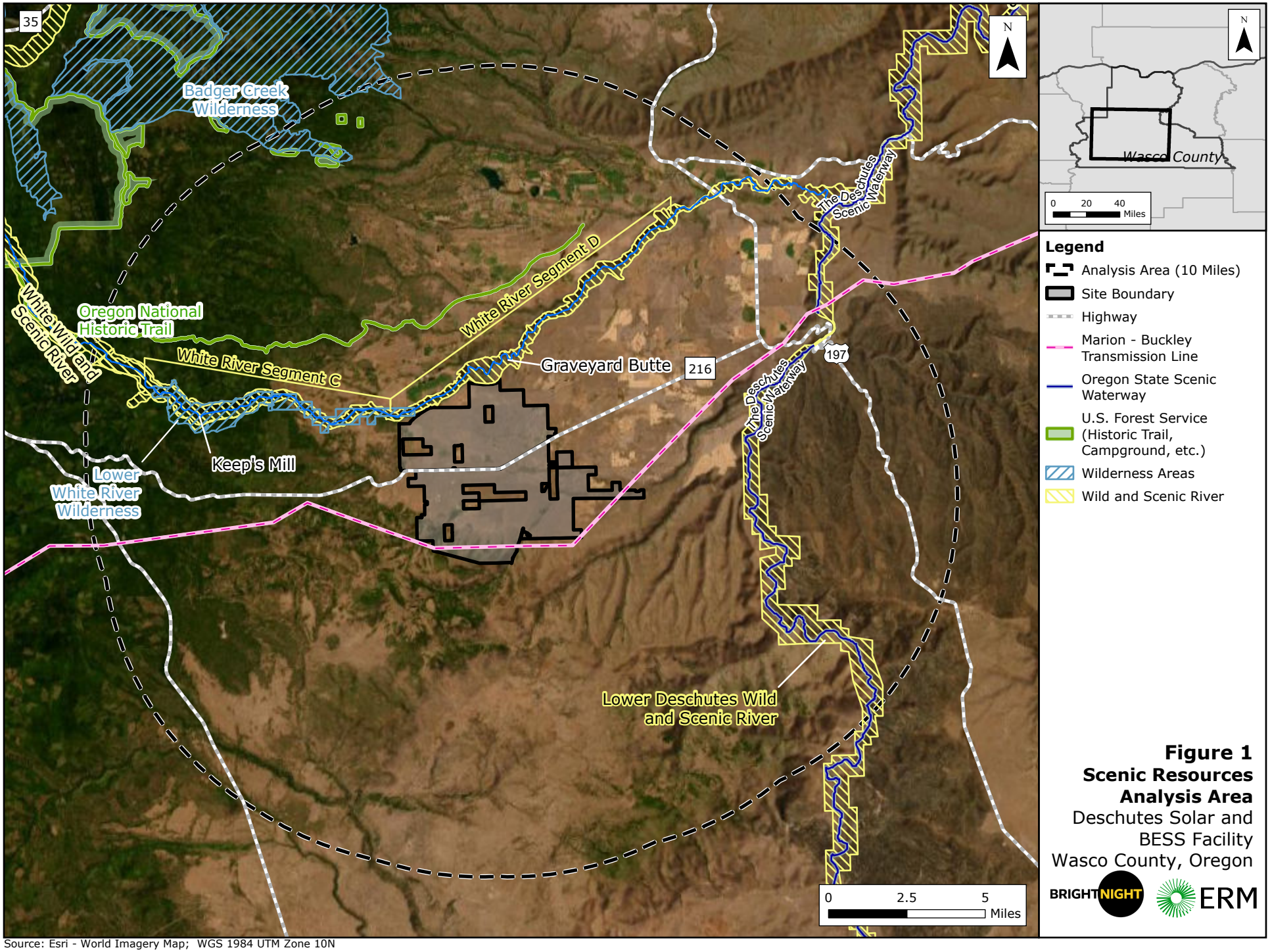

Figure 1
Scenic Resources Analysis Area
Deschutes Solar and BESS Facility
Wasco County, Oregon

BRIGHTNIGHT ERM

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

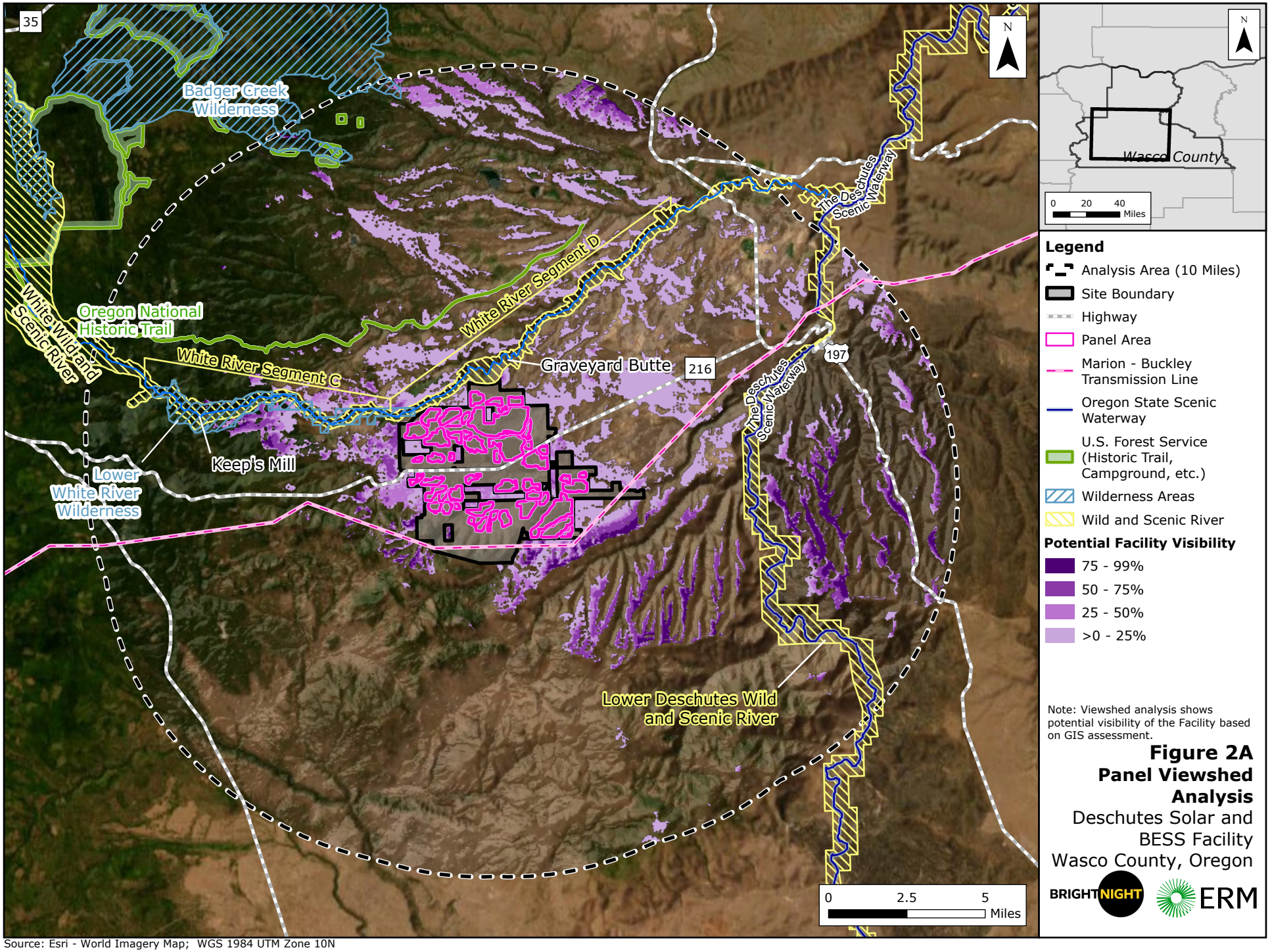

Figure 2A
Panel Viewshed Analysis
Deschutes Solar and BESS Facility
Wasco County, Oregon

BRIGHTNIGHT ERM

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

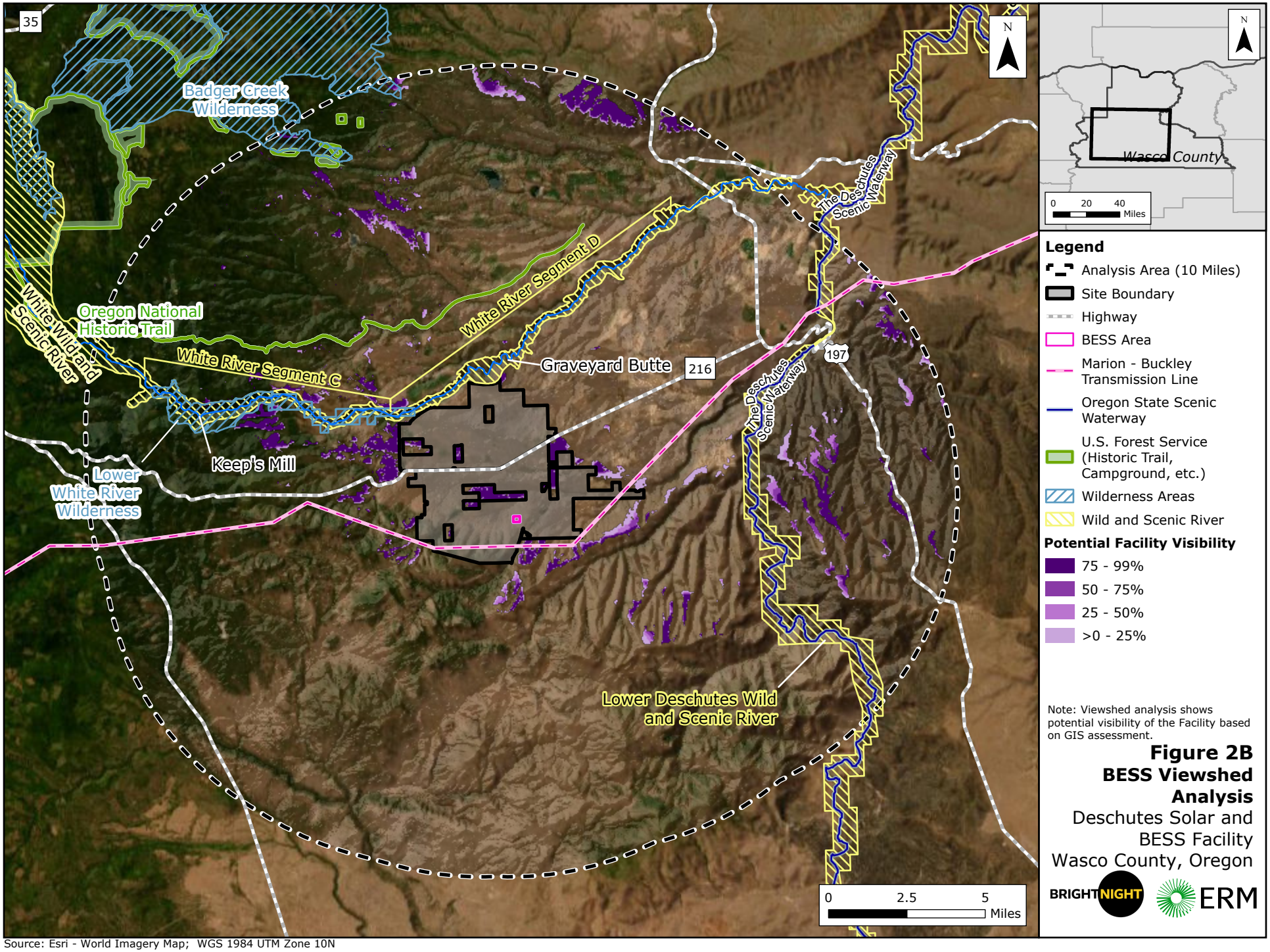

Figure 2B
BESS Viewshed Analysis
Deschutes Solar and BESS Facility
Wasco County, Oregon

BRIGHTNIGHT ERM

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

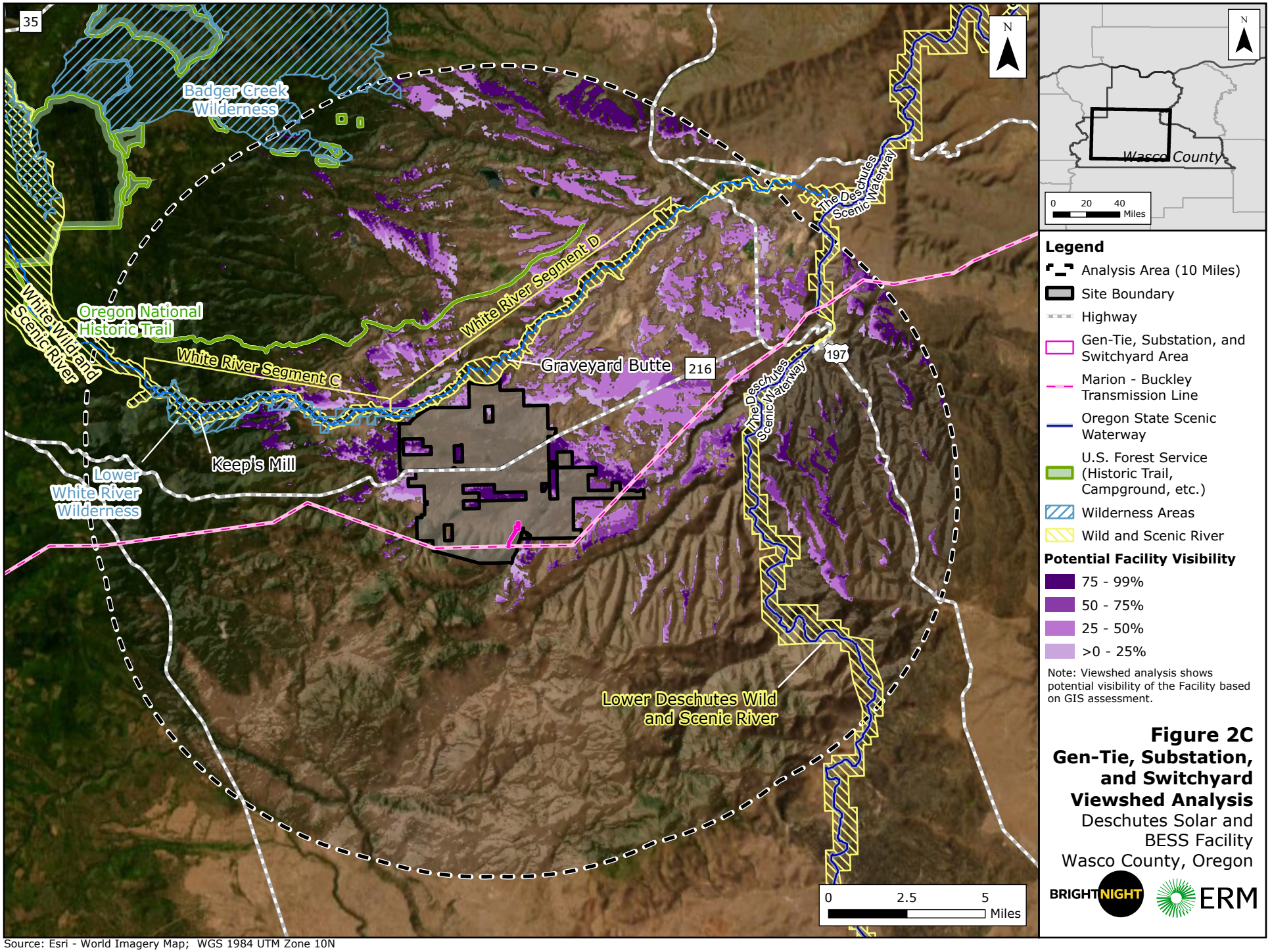

Figure 2C
Gen-Tie, Substation, and Switchyard Viewshed Analysis
Deschutes Solar and BESS Facility
Wasco County, Oregon

BRIGHTNIGHT ERM

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