



# Recreation Exhibit

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TABLE 1 INVENTORY OF RECREATIONAL OPPORTUNITIES IN THE ANALYSIS AREA

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## ACRONYMS AND ABBREVIATIONS

Acronym	Description
Applicant	DECH bn, LLC
BESS	Battery Energy Storage System
BrightNight	BrightNight, LLC
BLM	Bureau of Land Management
Facility	Solar photovoltaic power generation facility and related or supporting facilities in Wasco County, Oregon
GIS	Geographic Information System
NPS	National Park Service
OAR	Oregon Administrative Rule
ODFW	Oregon Department of Fish and Wildlife
USFS	USDA Forest Service
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 Recreation Exhibit has been prepared to meet the standards outlined in OAR 345-022-0100.

## 2. RECREATIONAL OPPORTUNITIES IN THE ANALYSIS AREA

*OAR 345-022-0100(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 impacts the proposed facility would have on important recreational opportunities in the analysis area, providing evidence to support a finding by the Council as required by OAR 345-022-0100, including:*

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

The analysis area for recreation resources is the site boundary<sup>1</sup> plus 5 miles. The analysis area is shown in Attachment 1, Figure 1. Methods used to identify potential recreational resources in the analysis area are described in Section 2.1 and the seven identified recreation resources are listed and described in Section 2.2. The identified recreational resources were evaluated for 'importance' based on the criteria listed in OAR 345-022-0100 and the importance assessment is provided in Section 2.3.

### 2.1 INVENTORY METHODS

Recreation opportunities in the analysis area were identified through desktop research of existing information from commonly available sources. The primary sources are listed below.

- Publicly available Geographic Information Systems (GIS) recreation site and use area data from federal and state outdoor recreation providers including the 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 (Google 2024)
- Public agency and other land management planning documents including the following comprehensive and master plans:
  - Comprehensive Management and Use Plan and Final Environmental Impact Statement for the Oregon, California, Mormon Pioneer, and Pony Express National Historic Trails (NPS 1993)
  - Lower Deschutes Management Plan and Record of Decision (BLM 1993)

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<sup>1</sup> The site boundary is included in the analysis area per OAR 345-001-0010(59)(d), but there are no public recreational opportunities within the site boundary.

- Mt. Hood National Forest Land and Resource Management Plan (USFS 1990)
- Wasco County 2040 Comprehensive Plan (Wasco County 2024)
- White River National Wild and Scenic River Management Plan (USFS 1994)
- Internet sites of agencies in the analysis area with recreation management responsibilities in the analysis area including BLM, City of Maupin, National Park Service (NPS) Oregon Department of Fish and Wildlife (ODFW), and USDA Forest Service (USFS)

## 2.2 RESOURCE DESCRIPTIONS

Based on the data sources listed in Section 2.1, there are seven recreation opportunities in the analysis area:

- Mt. Hood National Forest
- Lower White River Wilderness Area
- White River Wild and Scenic River
- Lower Deschutes Wild and Scenic River
- Oregon National Historic Trail
- White River Wildlife Area
- Oregon State Highway 216 (OR 216)

Most of these recreational opportunities are to the north and west of the site boundary and are primarily managed by federal and state agencies including the USFS, BLM, NPS, and ODFW. These recreation opportunities listed in Table 1, are shown on Attachment 1, Figure 1, and are described in more detail below.

As noted in the descriptions below, the recreation sites and use areas in the analysis area provide a variety of recreational activities including whitewater rafting, hiking, camping, fishing, hunting, horseback riding, mountain biking, picnicking, driving for pleasure, and sightseeing, among others. In addition to the activities available at designated sites and use areas, there may also be dispersed recreational opportunities within the analysis area. Dispersed opportunities typically occur outside of developed recreation sites and use areas across federal, state, local, and/or private lands. Within the analysis area, this may include similar activities to those listed previously, although no documentation was identified to quantify these uses.

### 2.2.1 MT. HOOD NATIONAL FOREST

The Mt. Hood National Forest (Forest) encompasses about 1.1 million acres with most of these acres on the west side of the Cascade Mountain Range (USFS 1993). The Forest has many designated recreation areas and sites and provides for dispersed recreational activities.

Recreational opportunities include camping, hiking, biking, climbing and caving, hunting, fishing, shooting, off-highway vehicle use, whitewater rafting, winter sports, and others. Within the analysis area, there are two specially designated use areas in the Forest: 1) White River Wild and Scenic River, and 2) Lower White River Wilderness Area (both areas span and are co-managed by the USFS and BLM). Each of these areas are described below. Outside of these specially

designated areas, there are several other smaller acreages of USFS-managed lands in the analysis area that may provide dispersed recreation opportunities.

### 2.2.2 LOWER WHITE RIVER WILDERNESS AREA

The Lower White River Wilderness Area is southeast of Mt. Hood and is managed by the BLM and the USFS. It was designated a Wilderness Area in 2009 to help protect 2,870 acres of federal lands along the White River Wild and Scenic River corridor (USFS 2024, BLM 2024). The site boundary is less than 0.1 mile from the Lower White River Wilderness Area. As a federally designated Wilderness Area, it protects important ecosystems from human-caused impacts and provides opportunities for solitude and primitive (dispersed) recreation. Like the White River Wild and Scenic River, the western portion of the Lower White River Wilderness Area is managed by the USFS, and the eastern portion is managed by the BLM.

### 2.2.3 WHITE RIVER WILD AND SCENIC RIVER

The White River flows approximately 53 miles from Mt. Hood to its confluence with the Deschutes River. At its closest point, it is less than 0.1 mile from the site boundary. It was designated as a Wild and Scenic River in 1988 with the following outstandingly remarkable values: geology, hydrology, botany, fish, wildlife, historic resources, recreation, and scenic resources (USFS 1994). To qualify as an outstandingly remarkable value, the "value must be a rare, unique, or exemplary" feature that is significant at a regional or national level. The river, from its headwaters to the confluence with the Deschutes River, is split into six segments. Segments A (3.3 miles), B (16.7 miles), E (5.6 miles), and F (1.8 miles) carry a recreational designation, while segments C (6.9 miles) and D (18 miles) are designated as scenic. Attachment 1, Figure 2 shows the segments of the White River (as displayed in the River Management Plan). For management purposes, the USFS administers segments A, B, and C while the BLM administers Segments D, E, and F (USFS 1994). The White River provides opportunities for whitewater rafting, fishing, camping, wildlife viewing, and other activities.

### 2.2.4 LOWER DESCHUTES WILD AND SCENIC RIVER

The Deschutes River flows 252 miles from its headwaters at Little Lava Lake in Deschutes County to its mouth on the Columbia River. Several segments of the river were designated an Oregon Scenic Waterway in 1970. The Lower Deschutes River, a segment that begins below the Pelton Regulating Reservoir and continues downriver to the confluence with the Columbia River, was designated as a Wild and Scenic River in 1988. The BLM's Lower Deschutes River Management Plan (BLM 1993) provides resource management direction for the Lower Deschutes Wild and Scenic River. The BLM's Prineville District Office administers 20,641 acres of public land within the designated Wild and Scenic River corridor. The outstandingly remarkable values of the Lower Deschutes Wild and Scenic River include botany, fish, geology, history, prehistory, recreation, scenery, and wildlife. The Lower Deschutes River Management Plan guides the protection and enhancement of these outstanding remarkable values. The Lower Deschutes Wild and Scenic River provides opportunities for whitewater rafting, fishing, camping, wildlife viewing, hiking and other activities. To help facilitate these opportunities, there are several developed campgrounds and day use sites (e.g., picnic areas, boat launches) along the river within the analysis area. Additionally,

the Lower Deschutes River Back Country Byway generally parallels the river within the analysis area.

#### 2.2.5 OREGON NATIONAL HISTORIC TRAIL

The Oregon Trail is a 2,170-mile trail that spans six states and was designated in 1978 as a National Historic Trail (NPS 2023). National Historic Trails follow and interpret irreplaceable, historic paths of travel that changed the history and character of the U.S. 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). While some segments of the Oregon National Historic Trail provide opportunities for recreation, it is not a continuous end-to-end type of trail. Along specific developed segments of the trail, there are opportunities for hiking, horseback riding, scenic driving, photography, interpretation and education, and visiting museums and visitor centers, among other activities. In other areas, the trail only consists of on the ground trail traces and remnants, structures, graves, landmarks, and other markers, and little to no traditional trail infrastructure. In the analysis area, the trail passes approximately 2 miles to the north of the site boundary. However, this segment of the trail does not have existing trail infrastructure or other types of recreational opportunities.

#### 2.2.6 WHITE RIVER WILDLIFE AREA

The White River Wildlife Area was created in 1953 and encompasses 30,370 acres that are managed by ODFW. The primary purpose of the area is to provide and protect winter range habitat for black-tailed deer and Rocky Mountain elk, but it also provides recreational opportunities including hunting, fishing, hiking, horseback riding, mountain biking, camping, and other activities (ODFW 2024). Portions of the western site boundary abut the White River Wildlife Area.

#### 2.2.7 OREGON STATE HIGHWAY 216

The Wasco County 2040 Comprehensive Plan provides policy guidance for “growth, development, services, and resource management” in the County (Wasco County 2024). There are no County-managed recreation use areas identified in the Comprehensive Plan that are within the analysis area; however, the plan identifies the protection of scenic views and sites, some of which may also be used for recreational purposes. One of these scenic resources is OR 216, a highway that stretches from mile post 0.00 (junction Warm Springs Highway or US 26) to mile post 26.17 (junction of The Dalles-California Highway or US 197), a portion of which is within the analysis area and along portions of the site boundary. While OR 216 is an identified scenic resource, scenic areas also provide recreational opportunities (e.g., driving for pleasure, sightseeing, etc.).

### 2.3 IMPORTANCE ASSESSMENT

*OAR 345-022-0100(2) The Council must consider the following factors in judging the importance of a recreational opportunity:*

- (a) Any special designation or management of the location;*
- (b) The degree of demand;*
- (c) Any outstanding or unusual qualities;*
- (d) The availability or rareness; and*

*(e) The irreplaceability or irretrievability of the opportunity.*

Typically, recreation sites and use areas are designated because they meet one or more of the criteria listed above. That is, parks, trails, scenic rivers, scenic highways, open space areas, and other resources are protected through federal, state, and/or local designation for a variety of reasons, which may include (among others): 1) to provide spaces for the public to enjoy the outdoors (demand), 2) to protect and preserve unique ecosystems and landscapes (outstanding qualities, rareness), 3) to protect culturally and/or historically significant resources (irreplaceable opportunities), 4) to provide areas for public environmental education and interpretation (demand), and 5) to preserve scenic landscapes (outstanding qualities).

While OAR 345-022-0100 does not define or specify how these criteria should be applied, all five criteria were evaluated and considered in aggregate for each of the identified recreation opportunities in the analysis area (Table 1). A recreation opportunity was determined to be important if it met at least three of the five criteria. Of the seven recreation opportunities in the analysis area (Section 3.2), five are considered “important” per the OAR 345-022-0100 criteria, as noted below and in Table 1.

TABLE 1 INVENTORY OF RECREATIONAL OPPORTUNITIES IN THE ANALYSIS AREA

Importance Criteria <sup>1</sup>								
Recreation Opportunity	Management Entity	Distance from Site Boundary	Special Designation <sup>2</sup>	Demand <sup>3</sup>	Outstanding or Unusual Qualities <sup>4</sup>	Rareness <sup>5</sup>	Replaceability <sup>6</sup>	Important Recreation Resource <sup>7</sup>
Mount Hood National Forest	USFS	<0.1	National Forest	Low	No	Common	Replaceable	No
Lower White River Wilderness Area	USFS	<0.1	Wilderness Area	Moderate	Yes	Uncommon	Not replaceable	Yes
White River Wild and Scenic River	BLM and USFS	<0.1	Wild and Scenic River	Moderate	Yes	Uncommon	Not replaceable	Yes
Lower Deschutes Wild and Scenic River	BLM	3.2	Wild and Scenic River	High	Yes	Uncommon	Not replaceable	Yes
Oregon National Historic Trail	NPS	2	National Historic Trail	Low	Unknown	Uncommon	Not replaceable	Yes
White River Wildlife Area	ODFW	<0.1	Wildlife Area	Moderate	Yes	Uncommon	Not replaceable	Yes
OR 216	Wasco County	<0.1	Scenic area	Low	No	Common	Replaceable	No

<sup>1</sup> Importance criteria are outlined in OAR 345-022-0100 and described in Section 3.3.

<sup>2</sup> Special designation indicates if the area carries a specific designation and if so, the type of designation.

<sup>3</sup> Estimated existing use levels, if available, were used as a proxy for demand for the opportunities available at each recreation site/use area. For purposes of this exhibit, a qualitative rating (high, moderate, low) was applied to these existing use levels.

<sup>4</sup> Outstanding or unusual qualities were determined based on existing information about the recreational opportunities in the analysis area (e.g., a management plan highlighted unique opportunities, destinations, resources, or other features in the area).

<sup>5</sup> The rareness of an opportunity was assessed based on the availability, or lack thereof, of similar opportunities in the region.

<sup>6</sup> Replaceability of a recreation opportunity was gaged based on the potential to replace or recreate the opportunity with a similar one (e.g., a campground could be replaced with a new campground in a different area, hunting opportunities could be replaced by shifting the activity to a new area with similar game species).

<sup>7</sup> For purposes of this exhibit, “important” recreation resources meet three or more of the importance criteria provided in OAR-345-022-0100.

### 2.3.1 MT. HOOD NATIONAL FOREST

Mt. Hood provides multiple outdoor recreation opportunities. However, the USFS-managed parcels in the analysis that are not otherwise specially designated (i.e., the White River Wild and Scenic River and the Lower White River Wilderness Area) are not considered an “important” recreational opportunity.

- **Special Designation/Management:** While the Mt. Hood National Forest is a federally designated National Forest, the individual parcels in the analysis area do not carry any special designation (e.g., Wilderness Area, Wild and Scenic River, designated recreation site/use area) other than being part of the National Forest.
- **Degree of Demand:** Per the most recent National Visitor Use Monitoring estimate, Mt. Hood National Forest receives more than 3 million site visits per year (USFS 2025). Since the acreage of the National Forest in the analysis area is small (i.e., 49,698 acres, not including specially designated areas), only a very small amount of this total use may occur on USFS-managed parcels that do not otherwise carry a special designation in the analysis area (low).
- **Outstanding/Unusual Qualities:** There are no known outstanding or unusual qualities on National Forest parcels in the analysis area.
- **Availability/Rareness:** The USFS-managed parcels in the analysis area are like other areas in the region (forested areas with dispersed recreational opportunities).
- **Irreplaceability:** The dispersed recreational opportunities that may be available on USFS parcels in the analysis area may be substituted at other areas in the region.

### 2.3.2 LOWER WHITE RIVER WILDERNESS AREA

The Lower White River Wilderness Area is considered an “important” recreational opportunity.

- **Special Designation/Management:** The Lower White River Wilderness Area is a federally designated Wilderness Area. This designation is the highest level of resource protection on federal lands.
- **Degree of Demand:** About 189,000 annual visits to Mount Hood National Forest are to designated Wilderness Areas (USFS 2025). It is unknown how many of these visits are to the Lower White River Wilderness Area (moderate).
- **Outstanding/Unusual Qualities:** The Lower White River Wilderness Area provides opportunities for solitude and primitive experiences.
- **Availability/Rareness:** Federally designated Wilderness Areas represent a small fraction of Oregon’s land base and provide scarce opportunities for primitive recreation.
- **Irreplaceability:** Federally designated Wilderness Areas represent a unique statutory protection that cannot be replicated.

### 2.3.3 WHITE RIVER WILD AND SCENIC RIVER

The White River Wild and Scenic River is considered an “important” recreational opportunity.

- Special Designation/Management: The White River is a federally designated Wild and Scenic River. This designation ensures the long-term management of important recreational opportunities (e.g., whitewater rafting, fishing) and other outstandingly remarkable values.
- Degree of Demand: The White River is used for whitewater rafting, fishing, hiking, dispersed camping, and other types of outdoor recreation activities. While specific use estimates are not available for the river, the USFS estimates that Forest-wide, 79.3 percent of visitors hike, 9.6 percent of visitors participate in a non-motorized water activity, 2.2 percent fish, and 1.9 percent camp in a dispersed/primitive area (USFS 2025). Some of these visits are attributable to the White River Wild and Scenic River (moderate).
- Outstanding/Unusual Qualities: The scenic canyon, sport fishing, and whitewater rafting opportunities contribute to the outstanding qualities of the White River.
- Availability/Rareness: Designated Wild and Scenic Rivers are rare in Oregon and across the county. The White River and other federally designated Wild and Scenic Rivers are a limited resource of high-value recreational opportunities.
- Irreplaceability: The combination of setting, hydrologic, natural resource, and recreational opportunities available on the White River Wild and Scenic River cannot feasibly be replaced.

#### 2.3.4 LOWER DESCHUTES WILD AND SCENIC RIVER

The Lower Deschutes Wild and Scenic River is considered an “important” recreational opportunity.

- Special Designation/Management: The Lower Deschutes River is a federally designated Wild and Scenic River. This designation ensures the long-term management of important recreational opportunities (e.g., whitewater rafting, fishing) and other outstandingly remarkable values.
- Degree of Demand: The Lower Deschutes River offers opportunities for whitewater rafting and fishing, among other recreational activities. The Lower Deschutes River is one of Oregon’s most visited rivers, with high levels of annual recreation use (BLM n.d.c)(high).
- Outstanding/Unusual Qualities: The river is recognized for world-class steelhead and trout fishing, challenging whitewater rafting, its dramatic canyon scenery, and other resource values.
- Availability/Rareness: Designated Wild and Scenic Rivers are rare in Oregon and across the county. The Lower Deschutes River and other federally designated Wild and Scenic Rivers are a limited resource of high-value recreational opportunities. In addition, the Lower Deschutes provides year-round recreational opportunities (other rivers in the region often are limited to specific seasons of use).
- Irreplaceability: The combination of setting, hydrologic, natural resource, and recreational opportunities available on the Lower Deschutes River Wild and Scenic River cannot feasibly be replaced.

#### 2.3.5 OREGON NATIONAL HISTORIC TRAIL

The Oregon National Historic Trail is considered an “important” recreational opportunity.

- Special Designation/Management: The National Historic Trail designation provides recognition and preservation of historically significant trail corridors and sites.
- Degree of Demand: Recreational use of the trail corridor within the analysis area is likely limited since there are no specifically identified recreation opportunities along this segment (low). While recreation is limited, the cultural and historic value of the trail corridor is still high.
- Outstanding/Unusual Qualities: For designation purposes, the entire trail corridor provides access to significant cultural and historic resource opportunities that document 19th century westward expansion in the U.S. However, there are no known opportunities in the analysis area.
- Availability/Rareness: Even if there is a lack of public recreational opportunities, intact segments of historic emigrant trails are generally scarce. It is unknown if there are intact trail segments in the analysis area, but the alignment is indicative of the potential for these types of historic trail remnants.
- Irreplaceability: While other National Historic Trails may provide similar interpretive recreational opportunities, the Oregon National Historic Trail corridor and its specific cultural and historic opportunities cannot be replicated.

### 2.3.6 WHITE RIVER WILDLIFE AREA

The White River Wildlife Area is considered an “important” recreational opportunity.

- Special Designation/Management: The White River Wildlife Area is a state designated wildlife management area that provides habitat protection and wildlife-dependent recreation opportunities.
- Degree of Demand: Hunting, trapping, and angling use of the wildlife area is estimated at slightly more than 19,000 annual use days (ODFW 2024). Other recreational uses (e.g., wildlife viewing and photography, hiking, horseback riding, camping) account for an additional 11,650 annual use days (moderate).
- Outstanding/Unusual Qualities: The area provides critical big game winter range and publicly accessible hunting opportunities.
- Availability/Rareness: In the region, while there may be other areas that provide wildlife management and hunting opportunities, there are very few large, ODFW-managed areas that provide comparable recreation opportunities.
- Irreplaceability: Habitat and game-dependent recreation cannot be easily relocated, although some activities could occur in other publicly accessible natural areas in the region.

### 2.3.7 OREGON STATE HIGHWAY 216

OR 216 provides scenic travel opportunities and access but is not considered an “important” recreational opportunity.

- Special Designation/Management: OR 216 is a designated scenic area per the Wasco County Comprehensive Plan, but it is not a designated state scenic highway.

- Degree of Demand: Annual average daily traffic on OR 216 ranges from 275 to 649 vehicles per day (ODOT 2023). While some of this traffic may be for recreational purposes, most is likely for regional travel and local access (low).
- Outstanding/Unusual Qualities: The highway does provide scenic views of the regional landscape; however, these views are incidental to the primary transportation function of the highway.
- Availability/Rareness: Multiple other highways and local roadways in the region provide similar scenic travel opportunities.
- Irreplaceability: While OR 216 provides scenic driving and viewing opportunities, this type of travel experience could be substituted by other regional routes.

## 3. IMPACT ASSESSMENT

*OAR 345-022-0100(5)(b) A description of any potential adverse impacts to the important opportunities identified in subsection (a) including, but not limited to:*

- (A) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation;*
- (B) Noise resulting from facility construction or operation;*
- (C) Increased traffic resulting from facility construction or operation; and*
- (D) Visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality.*

### 3.1 DIRECT OR INDIRECT LOSS OF RECREATIONAL OPPORTUNITY

For a direct loss of an opportunity, the Facility would need to physically encroach on an existing important recreational opportunity in the analysis area. The Facility will not be sited within any of the important recreation areas in the 5-mile analysis area. Additionally, construction and operation of the Facility will not limit access to these areas since the primary access routes to the important recreation areas are not through or adjacent to the site boundary. As such, there will be no direct or indirect losses to recreation opportunities at the identified important recreation areas because of Facility construction or operation.

### 3.2 NOISE

The State and Local Laws and Regulations Exhibit addresses the existing acoustical environment and anticipated Facility sound levels. Any noise resulting from Facility construction or operation is not expected to adversely impact the important recreational opportunities in the 5-mile analysis area.

#### 3.2.1 CONSTRUCTION NOISE

As described in section 3.1 of the Protected Areas Exhibit, 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. 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<sup>2</sup>. More information can be found in the Protected Areas Exhibit. Construction noise is not expected to adversely affect important opportunities, as described in more detail in the sections below.

### 3.2.1.1 LOWER WHITE RIVER WILDERNESS AREA

Within the Wilderness Area, there are no official trails, and only a few short stretches of abandoned roads<sup>3</sup>. Thus, the wilderness is little visited, and most people access the White River at the Wilderness Area's western edge at Keeps Mill Campground<sup>4</sup>, 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

### 3.2.1.2 WHITE RIVER WILD AND SCENIC RIVER

Access to the White Wild and Scenic River closest to the site boundary is from Graveyard Butte trailhead, from which visitors can traverse down the canyon to access the river. Access to the top of the trailhead 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<sup>5</sup>. 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 recreation within the area.

### 3.2.1.3 LOWER DESCHUTES WILD AND SCENIC RIVER

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

### 3.2.1.4 OREGON NATIONAL HISTORIC TRAIL

Some segments of the Oregon NHT are accessible through current hiking trails, though this is not the case for the segment nearest to the site boundary<sup>6</sup>, which includes the mapped extent of the trail but is not maintained or otherwise widely accessed by the public. Thus, while the mapped extent of the trail passes within 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, construction related noise levels would fall to 0 dBA.

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<sup>2</sup> <https://www.iso.org/standard/20649.html>"ISO 9613-2:1996 - Acoustics — Attenuation of sound during propagation outdoors — Part 2: General method of calculation

<sup>3</sup> [Lower White River Wilderness Area | Bureau of Land Management](#)

<sup>4</sup> [McCubbins Meadow Hike - Hiking in Portland, Oregon and Washington](#)

<sup>5</sup> [Noise and Vibration Resource Report for Programmatic Environmental Impact Statement on Solar Energy Facilities in Washington State](#)

<sup>6</sup> [Hike on the Oregon Trail \(U.S. National Park Service\)](#)

### 3.2.1.5 WHITE RIVER WILDLIFE AREA

There is limited public access for recreation and the “primary objective of the area is to benefit the wildlife resource.”<sup>7</sup> 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. This level of noise, occurring temporarily and intermittently, will not significantly impact wildlife or recreational hunting activities.

### 3.2.2 OPERATIONAL NOISE

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.<sup>8</sup> The Applicant modeled operational noise compared to Oregon Department of Environmental Quality’s conservative assumed threshold of 36 dBA.<sup>9</sup> Modeled operational noise levels for all important opportunities identified in Table 1 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 important opportunities, as described in more detail in the sections below.

#### 3.2.2.1 LOWER WHITE RIVER WILDERNESS AREA

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 the wilderness area.

#### 3.2.2.2 WHITE RIVER 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 area adjacent to the site boundary. This modeled noise level is not expected to impact recreational or scenic values of the river corridor.

#### 3.2.2.3 LOWER DESCHUTES WILD AND SCENIC RIVER

This area is at a distance such that modeled operational noise levels are near or at 0 dBA, thus no impact to recreational opportunities is expected.

<sup>7</sup> White River Wildlife Area

<sup>8</sup> 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)

### 3.2.2.4 OREGON NATIONAL HISTORIC TRAIL

This area is at a distance such that modeled operational noise levels are near or at 0 dBA, thus no impact to recreational opportunities is expected.

### 3.2.2.5 WHITE RIVER WILDLIFE AREA

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. This modeled noise level is not expected to impact recreational values of the Wildlife Area.

## 3.3 TRAFFIC

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, and most of the construction commuter 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, a portion of OR 216 is within the analysis area. Construction traffic would travel adjacent to portions of the White River Wildlife Area and The Deschutes Wild and Scenic River. 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 within the analysis area; thus, construction truck and commuting traffic will not negatively impact important recreational opportunities.

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 OR 216; therefore, operational traffic impacts would be negligible.

## 3.4 VISUAL

The Applicant assessed potential visual impacts based on the expected visibility of the aboveground features of the proposed Facility from important recreational opportunities 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. Additional details about the ZVI analysis methodology are provided in the Scenic Resources Exhibit.

The Applicant ran three iterations of the ZVI to account for the different types of structures and structure heights in the preliminary site design of the Facility. The structure groupings and heights include:

- Solar panels – 11 feet maximum height
- Battery Energy Storage System (BESS) – 9.5 feet maximum height
- Substation, Switchyard and Generation-Tie (poles) – 95 feet maximum height

The ZVI analysis results are displayed on Attachment 1, Figures 2a, 2b, and 2c. Based on these results, there would be minimal visibility of the Facility structures from the important recreational opportunities in the analysis area (the Scenic Resources Exhibit quantifies areas of potential visibility including from nearby recreation resources). Topography, existing vegetative cover, and distance likely limit most potential views. In those areas where there would be potential visibility, the Facility structures would add geometric forms, short vertical and horizontal lines, and neutral and non-reflective metallic colors. Specific potential visibility from each identified recreation opportunity in the analysis area is described in the sections below.

### 3.4.1 WHITE WILD AND SCENIC RIVER

In the analysis area, the viewshed analysis indicates that there would be negligible viewing opportunities of the Facility structures. The recreational opportunities on the White River are generally concentrated on or immediately along the river, which is in a canyon. The river is approximately 450 feet lower in elevation than the canyon rim and about 475 feet lower than the adjacent site boundary. The river canyon terrain and viewing angles from within the canyon will generally block outward views toward the Facility structures, which means that someone using the river for recreation (e.g., white water rafting or fishing) would not be able to see the Facility from the river. As such, the Facility's structures would result in no effect on visual conditions in the White Wild and Scenic River and negligible effect on visual conditions along the rim of the canyon.

### 3.4.2 LOWER WHITE RIVER WILDERNESS AREA

Like with the White Wild and Scenic River, there will be no viewing opportunities of Facility structures from those portions of the Lower White River Wilderness Area that are within the river canyon (i.e., someone recreating on the river would not be able to see the Facility). However, since the wilderness area extends outside of the river canyon, there will be some potential viewing opportunities from specific areas along the rim of the canyon (Attachment 1, Figures 3 through 5).

Overall, the areas of the Lower White River Wilderness Area from which the Facility structures would potentially be visible are relatively small and generally represent less than 15 percent of the total acreage of the area. As such, the Facility's potential effect on visual conditions and the visitor experience at the wilderness area is anticipated to be minor.

### 3.4.3 WHITE RIVER WILDLIFE AREA

Given the proximity of the White River Wildlife Area to the Facility, there is a higher degree of potential visibility in this area compared to the other recreation opportunities in the analysis area. For visitors to this area, the Facility structures would potentially be visible from multiple locations, especially those closest to the site boundary (Attachment 1, Figures 2a, 2b, and 2c). In total,

Facility structures would potentially be visible from about 28 percent of the wildlife area. This area serves primarily as rangeland for black-tailed deer and Rocky Mountain Elk and to reduce damage to nearby private croplands. There is limited recreation and seasonal road access permitted, though the "primary objective of the area is to benefit the wildlife resource."<sup>9</sup> The Wildlife Area is most often used by the public for hunting elk and deer in the late fall. Potential visibility of the Facility from some portions of the Wildlife Area would not directly affect wildlife habitat or behavior. As such, the Facility's potential effect on visual conditions and the visitor experience at the wildlife area is anticipated to be moderate.

#### 3.4.4 OREGON NATIONAL HISTORIC TRAIL

In the analysis area, there would be some potential visibility of Facility structures from the approximate alignment of the Oregon National Historic Trail, particularly of the Facility's solar panels and poles (substation, switchyard, and generation-tie) from certain areas along the trail route (Attachment 1, Figure 2A). However, since there are no formalized recreation opportunities along the portion of the trail that crosses the analysis area, or any intact portions of the trail, potential effects on visual conditions are expected to be negligible.

#### 3.4.5 LOWER DESCHUTES WILD AND SCENIC RIVER

The viewshed analysis indicates that there would be negligible viewing opportunities of the Facility structures from the portion of the Lower Deschutes Wild and Scenic River that is in the analysis area. Like the White River, the recreational opportunities on the Deschutes River are generally concentrated on or immediately along the river. The river canyon terrain and viewing angles from within the canyon will generally block outward views toward the Facility structures, which means that someone using the river for recreation (e.g., whitewater rafting or fishing) would not be able to see the Facility from the river. As such, the Facility's structures would result in negligible effects on visual conditions in the Lower Deschutes Wild and Scenic River.

In addition, there will be no visual impacts from emission plumes as the Facility will not generate plumes. Substantial glare is also not anticipated to result in any effects on visual resources since the proposed Facility's solar panels will be designed to absorb rather than reflect sunlight and will be treated with an antiglare coating.

### 3.5 SUMMARY OF IMPACTS

*OAR 345-022-0100(5)(c) An evaluation of the significance of the potential adverse impacts identified under subsection (b);*

The Facility has been designed to minimize direct and indirect impacts to important recreation opportunities in the analysis area. Overall, Facility construction and operation are not anticipated to have a significant adverse impact on recreation opportunities (Table 2). These opportunities will not be impacted by the loss of access, noise, traffic, and/or potential Facility structure visibility (and corresponding changes in landscape characteristics).

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<sup>9</sup> White River Wildlife Area

TABLE 2 SUMMARY OF IMPACTS TO IMPORTANT RECREATIONAL OPPORTUNITIES

Recreational Opportunity	Direct or Indirect Loss of Opportunity?	Worst-case Modeled Operational Noise Level (dBA L <sub>50</sub> ) <sup>1</sup>	Maximum Received Sounds Levels During Construction (dBA) <sup>1</sup>	Potential Traffic Impacts <sup>2</sup>	Potential Visual Impacts
White Wild and Scenic River	No	29	49	Negligible	Negligible
Lower White River Wilderness Area	No	26	0	Negligible	Minor
White River Wildlife Area	No	29	55	Negligible	Moderate
Oregon National Historic Trail	No	0	0	Negligible	Negligible to Minor
Deschutes Wild and Scenic River	No	0	0	Negligible	Negligible

<sup>1</sup> See the State and Local Laws and Regulations Exhibit

<sup>2</sup> See the Public Services Exhibit

dBA = A-weighted decibels

L50 = noise level exceeded 50 percent of the time

## 4. MITIGATION

*OAR 345-022-0100(5)(d) A description of any measures the applicant proposes to avoid, reduce or otherwise mitigate any significant adverse impacts identified in subsection (b);*

As noted in Section 3, the Facility will not result in significant direct or indirect impacts on any of the important recreational opportunities in the 5-mile analysis area. As such, no mitigation measures are proposed to avoid, reduce, or otherwise mitigate significant adverse impacts.

## 5. MONITORING OF IMPACTS

*OAR 345-022-0100(5)(f) The applicant's proposed monitoring program, if any, for impacts to important recreational opportunities.*

A monitoring program for recreation is not proposed since construction and operation of the proposed Facility will not result in significant direct or indirect impacts to recreational opportunities in the analysis area.

## 6. CONCLUSION

This exhibit addresses the required information pursuant to OAR 345-022-0100(5)(a) through (f). As documented in the exhibit, the design, construction, and operation of the Facility will not result in significant direct or indirect impacts to recreational opportunities. Therefore, the Facility complies with OAR 345-022-0100.

## 7. APPROVAL STANDARDS

The Applicant has satisfied the Approval Standards of OAR 345-022-0100, summarized in Table .

TABLE 3 APPROVAL STANDARDS MATRIX

Approval Standard	Section
OAR 345-022-0100(1) <i>To issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities.</i>	Section 3
<p>(2) The Council must consider the following factors in judging the importance of a recreational opportunity:</p> <ul style="list-style-type: none"> <li>(a) Any special designation or management of the location;</li> <li>(b) The degree of demand;</li> <li>(c) Outstanding or unusual qualities;</li> <li>(d) Availability or rareness;</li> <li>(e) Irreplaceability or irretrievability of the opportunity.</li> </ul>	Section 2
<p>(3) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 (Request for Expedited Review of Special Criteria Facilities) without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.</p>	This section does not apply.
<p>(4) The Council must apply the version of this rule adopted under Administrative Order EFSC 1-2002, filed and effective April 3, 2002, 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.</p>	This section does not apply.
<p>(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 impacts the proposed facility would have on important recreational opportunities in the analysis area, providing evidence to support a finding by the Council as required by OAR 345-022-0100, including:</p>	
<p>(a) A description of the recreational opportunities in the analysis area that includes information on the factors listed in OAR 345-022-0100(1) as a basis for identifying important recreational opportunities;</p>	Section 2
<p>(b) A description of any potential adverse impacts to the important opportunities identified in subsection (a) including, but not limited to:</p>	Section 3
<p>(A) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation;</p>	Section 3.1

(B) Noise resulting from facility construction or operation;	Section 3.2
(C) Increased traffic resulting from facility construction or operation; and	Section 3.3
(D) Visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality.	Section 3.4
(c) An evaluation of the significance of the potential adverse impacts identified under subsection (b);	Section 2.3
(d) A description of any measures the applicant proposes to avoid, reduce or otherwise mitigate any significant adverse impacts identified in subsection (b);	Section 4
(e) A map of the analysis area showing the locations of important recreational opportunities identified in subsection (a);	Section 2, Attachment 1 (Figure 1)
(f) The applicant's proposed monitoring program, if any, for impacts to important recreational opportunities.	Section 5

## 8. REFERENCES

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## ATTACHMENT 1 FIGURES

Figure 1- Analysis Area

Figure 2A- Solar Panel Viewshed Analysis

Figure 2B- BESS Viewshed Analysis

Figure 2C- Gen-Tie Viewshed Analysis







