

Exhibit T Recreation

Umatilla-Morrow County Connect Project



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Application for Site Certificate

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FIGURE T-1	RECREATION AREAS
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ACRONYMS AND ABBREVIATIONS

BLM	Bureau of Land Management
dBA	A-weighted decibels
Hwy	Highway
I-	Interstate
NWR	National Wildlife Refuge
OAR	Oregon Administrative Rule
ODFW	Oregon Department of Fish and Wildlife
OPRD	Oregon Parks and Recreation Department
Project	Umatilla-Morrow County Connect Project
Project Order	Administrative Rules, and Other Requirements Applicable to the Proposed Umatilla-Morrow County Connect Project (First Amended Project Order; April 04, 2024)
SWA	State Wildlife Area
U.S.C.	United States Code
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service

1.0 INTRODUCTION

Exhibit T provides an analysis of recreational resources for the Umatilla-Morrow County Connect Project (Project) as required by Oregon Administrative Rule (OAR) 345-021-0010(1)(t). Exhibit T contains information relating to the potential of adverse impacts to important recreational opportunities as a result of construction and operation of the Project. Specifically, Exhibit T shows the Project is not likely to result in significant adverse impacts to recreational resources and important recreational opportunities. Exhibit T also includes an analysis of direct or indirect loss of a recreational opportunity due to construction or operation associated with noise, traffic and visual impacts as required by OAR 345-021-0010(1)(t)(B)(i) through (iv). Visual impacts associated with recreational opportunities required under OAR 345-021-0010(1)(t)(B)(iv) are discussed in Exhibit R.

2.0 ANALYSIS

2.1 Analysis Area

The analysis area for Exhibit T is the area within the Project site boundary and two miles from the Project site boundary (Umatilla-Morrow County Connect First Amended Project Order (April 4, 2024), pages 54 and 55). The Project features are described in Exhibit B, and the Project site boundary for each Project feature is described in Exhibit C. The location of the Project features and the Project site boundary is provided in Exhibit C. The boundary of the recreational opportunities analysis area is shown on Figure T-1 (OAR 345-021-0010(1)(t)(D)).

2.2 Methods

The following sources were reviewed to identify recreational opportunities within the analysis area:

- » Geographic Information Systems data documenting land areas and sites potentially associated with recreational resources managed by key public agencies, including the Bureau of Land Management (BLM), United States Forest Service (USFS), United States Fish and Wildlife Service (USFWS), Oregon Parks and Recreation Department (OPRD), National Park Service and Oregon Department of Fish and Wildlife (ODFW).
- » Land management agency planning documents, including the Umatilla County Comprehensive Plan (Umatilla County 2018), Morrow County Comprehensive Plan (Morrow County 1986), and City of Hermiston Comprehensive Plan (City of Hermiston 2021).
- » BLM and USFS lists of recreation sites, features, and activities.
- » Publicly available internet sites maintained by recreation provider agencies, including OPRD and county and city park departments.
- » Publicly available internet sites maintained by various commercial entities, including sites providing general recreation and tourism information and sites applicable to specific private-sector recreation opportunities.

2.3 Resources Identified in Analysis Area

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

OAR 345-021-0010(1)(t)(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.

OAR 345-022-0100(1): The Council shall consider the following factors in judging the importance of a recreational opportunity: (a) Any special designation or management of the location; (b) The degree of demand; (c) Outstanding or unusual qualities; (d) Availability or rareness; (e) Irreplaceability or irretrievability of the opportunity.

In general, recreational activities in the Project vicinity are typically associated with the Columbia River corridor, local parks and recreation areas within Hermiston and Boardman, and regional tourist activities associated with sightseeing, hunting, fishing, watersport, and other activities. These opportunities may occur in a number of locations in a surrounding area. There are limited recreational opportunities or designated areas within the analysis area. The majority of land in the analysis area is privately owned which limits access to recreational activities by the general public.

There are three identified recreational opportunities within the analysis area (Table T-1, Figure T-1). These include a portion of the Umatilla National Wildlife Refuge (NWR), the Coyote Springs State Wildlife Area (SWA), and the privately owned Hermiston Gun Club. Recreational opportunities within the analysis area are described below in order of federal, state, local, and private ownership/management.

Federal

The USFWS manages Umatilla NWR, located on and around the Columbia River approximately 15 miles northwest of Hermiston, Oregon. Umatilla NWR was established in 1969 as mitigation for habitat lost through flooding from the construction of the John Day Dam. The approximate 23,555-acre refuge is made up of waters, islands, shores, and uplands in and around the Columbia River. The natural and managed wetlands, mixed with native shrub-steppe, provide habitat for an abundance of Columbia Basin species. Umatilla NWR is vital to migratory waterfowl, bald eagles, colonial nesting birds, and other migratory and resident wildlife. Specific resources include a boat ramp, trail, and auto tour route on McCormack Slough. Recreational opportunities in this area include wildlife viewing and interpretation, hunting, fishing, and hiking (USFWS 2024).

A small portion of the southeastern corner of this refuge is located within the analysis area and is approximately 1.7 miles north of the Project site boundary. There are other recreational opportunities in the Project vicinity that provide similar recreational activities (e.g., Cold Springs National Wildlife Area and McNary NWR). However, the McCormack unit is identified as a focal point for Umatilla Refuge wildlife viewing activities (Objective 9d of the Umatilla NWR Comprehensive Conservation Plan [Umatilla 2018]). While there are similar recreational opportunities in the Project vicinity, this recreational resource is considered a unique and important opportunity because of its varied habitat types which include natural and managed wetlands, mixed with native shrub-steppe and abundant Columbia Basin species. This site

experiences relatively high demand, and provides hunting, fishing and other readily accessible wildlife-oriented opportunities that are easily accessed by an urban population. The priority of the refuge is to conserve, manage, and if needed, restore fish and wildlife populations and habitats according to its purpose. Therefore, Umatilla NWR is an important recreational opportunity because of its designation status, high level of use, relative rareness, and irreplaceable character.

State

ODFW manages Coyote Springs SWA located within the analysis area approximately 0.6 miles west of the Project site boundary. Coyote Springs SWA is 160 acres of agricultural, grassland, shrub, and seasonal wetlands with some open water at times and is centrally located within the Port of Morrow Regulated Hunt Area boundary. This wildlife area is open to wildlife-oriented public use compatible with the goals and objectives contained in the 2008 Columbia Basin Wildlife Area (OAR 635-008-0070). Coyote Springs SWA is one of the four wildlife areas managed by ODFW in the Columbia Basin.

This wildlife area is located within an active agricultural area with railroad tracks to the north, Interstate (I-) 84 to the south, and an existing transmission line transects the wildlife area. This wildlife area is walk-in access only; motor vehicle use is restricted to the parking area and public access roads. There are other recreational opportunities in the Project vicinity that provide similar recreational activities. Therefore, Coyote Springs SWA is considered somewhat common. While there are similar recreational opportunities in the Project vicinity, this recreational resource is considered an important opportunity because of its designation status and varied habitat types. This site experiences relatively moderate demand and provides game bird hunting and other readily accessible wildlife-oriented opportunities.

Local Governments and Special Districts

No county or city recreation opportunities were identified within the analysis area.

Private

The Hermiston Gun Club is located within the analysis area immediately adjacent to the Project site boundary on Gun Club Road approximately one mile west of Ordinance Road. No privately owned recreational opportunities were identified within the analysis area.

2.3.1 Importance Criteria

A recreational opportunity may be determined important based on assessment of available information specific to each criterion, and by qualitatively balancing the attributes for all five criteria for an identified resource (Table T-1). Within the analysis area, identified recreational opportunities were evaluated for "importance" based on the criteria outlined in OAR 345-022-0100(1)(a) through (e) detailed below:

(a) Any special designation or management of the location;

Protection levels of recreational resources are based on the special management designations that apply to the lands.

(b) The degree of demand;

The level of demand was given a qualitative rating of “High,” “Moderate,” and “Low” for an identified recreational opportunity.

(c) Outstanding or unusual qualities;

As there is a wide variety in the perceptions, tastes, and values of the public regarding recreational opportunities, the identification of the characteristics that may be considered outstanding or unusual for a certain recreational opportunity is highly subjective. Furthermore, the standard does not specifically define the qualities that would measure an opportunity as “outstanding” or “unusual.” Certain areas and sites have attributes that qualify them as “unique,” while others possess qualities that are not unique, but are intuitively set apart for other opportunities and could be considered as outstanding or unusual.

(d) Availability of rareness;

Ratings of “Rare,” “Uncommon,” and “Common” were utilized to address the criterion based on the discernible rareness of an opportunity. In considering this attribute, comparable opportunities available within the region surrounding the Project were analyzed.

(e) Irreplaceability or irretrievability of the opportunity.

In addressing the criterion based on the ability to replace opportunity, ratings of “Irreplaceable,” “Somewhat Irreplaceable,” and “Replaceable” were used. Generally, opportunities considered “Irreplaceable” were based on inherent natural resource characteristics that could not reasonably be recreated in the same place or in another nearby location. Recreational opportunities considered “Replaceable” are based on recreational facilities or infrastructure that has been constructed, such as campgrounds.

TABLE T-1. RECREATIONAL OPPORTUNITIES IN THE ANALYSIS AREA – IMPORTANCE CRITERIA

RECREATIONAL OPPORTUNITY	DISTANCE AND DIRECTION FROM PROJECT SITE BOUNDARY	IMPORTANCE CRITERIA				
		SPECIAL DESIGNATION / MANAGEMENT	DEMAND	OUTSTANDING OR UNUSUAL QUALITIES	AVAILABILITY / RARENESS	IRREPLACEABILITY / IRRETRIEVABILITY
Umatilla NWR (United States Fish and Wildlife Service)	1.7 miles north	A National Wildlife Refuge included in the National Wildlife Refuge System described under 16 U.S.C. 668dd	High	Umatilla NWR offers a variety of passive and active recreational opportunities from hiking, fishing, bird watching, to hunting	Other similar recreational opportunities are located in the Project vicinity. However, this NWR offers several unique recreational experiences, therefore, this is considered relatively rare in the region.	Irreplaceable
Coyote Springs State Wildlife Area (Oregon Department of Fish and Wildlife)	0.6 mile west	A state wildlife refuge or management area identified in OAR chapter 635, division 008	High to Moderate	Coyote Springs SWA offers a variety of passive and active recreational opportunities from hiking, bird watching, to hunting.	Other opportunities for similar recreational uses are located in the Project vicinity; therefore, this resource is considered somewhat common in the Project vicinity.	Irreplaceable
Hermiston Gun Club	<0.1 mile south	Private shooting facility	Moderate to Low	None	Other opportunities for similar recreational uses are located in the region; therefore, this resource is considered somewhat common.	Somewhat Irreplaceable

2.4 Potential Impacts

OAR 345-021-0010(1)(t)(B): description of any significant potential adverse impacts to the important opportunities identified in (A) including, but not limited to: (i) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation; (ii) Noise resulting from facility construction or operation; (iii) Increased traffic resulting from facility construction or operation; (iv) Visual impacts of facility structures or plumes.

The inventory in Section 2.3 identifies two important recreational opportunities in the analysis area. The following sections provide an analysis relative to important recreational opportunities in the analysis area to determine whether the Project's design, construction, and operation, when considering mitigation, would likely result in significant adverse impacts.

2.4.1 Direct or Indirect Loss of Recreational Opportunity

As described above, three important recreational opportunities are located in the analysis area. However, no recreational opportunities are located within the Project site boundary or crossed by the proposed Project. The proposed Project will not physically disturb the Umatilla NWR, Coyote Springs SWA, or Hermiston Gun Club. As discussed below, construction and operation of the Project may affect important recreational opportunities due to potential noise, traffic, or visual impacts; however, potential impacts will not result in significant adverse impacts or result in any indirect loss of recreational opportunities on identified resources within the analysis area. No direct or indirect loss of recreational opportunities will occur.

2.4.2 Noise

OAR 345-021-0010(1)(t)(B)(ii): Noise resulting from facility construction or operation.

Construction Noise

Noise produced during Project construction will be temporary, short term, and limited to relatively small portions of the Project site at any given time as construction progresses. Project-related activities that will periodically generate audible noise during construction include vegetation clearing, grading, drilling holes for the foundations, tower erection, wire pulling, and construction vehicle traffic. From a regulatory perspective, Project-related construction sounds are exempt from the Oregon Department of Environmental Quality's noise standards and regulations.¹ Nonetheless, Project-related construction noise will not result in significant adverse impacts to recreational resources in the analysis area because construction activities will progress along the corridor, and therefore, no single area will be exposed to construction noise for the entire construction period.

Exhibit Y provides baseline sound measurements at noise sensitive receptors (refer to Attachment Y-1 in Exhibit Y) and an assessment of the predicted construction and operational noise levels. The methodology for noise modeling is discussed in detail in Exhibit Y. Based on

¹ OAR 340-035-0035(5)(g) and (h).

sound levels of the anticipated equipment for Project construction and given that the recreational opportunities identified in the analysis area are located more than 3,000 feet from the Project site boundary, construction noise will not likely be distinguishable from existing background noise levels.

Exhibit Y provides ambient baseline sound levels and compared the baseline with predicted future Project sound level contributions. The results of this analysis indicate that during typical fair weather conditions, the Project is anticipated to comply with the ambient antidegradation standard. Attachment Y-3 include a summary table of the acoustic modeling output by receptor location, unique receptor identification number, identification of transmission line noise sources evaluated, the distance to the noise source(s), the baseline monitoring position associated with each noise sensitive receptor, and the modeled results in A-weighted decibels (dBA). As illustrated in Table Y-5, Coyote Springs SWA and Umatilla NWR are not expected to result in an increase in dBA during bad weather conditions. It is anticipated that Coyote Springs SWA will receive up to 61 dBA, at the loudest, at the eastern borders of the recreational area (i.e., the closest portion to the Project site boundary); this sound level is equivalent to that of a normal conversation.

Construction noise impacts on Hermiston Gun Club are considered negligible due to the nature of the recreational activity occurring at the site.

Operational Noise

Given the distance to the Umatilla NWR (1.7 miles away), the sound levels are anticipated to be low or negligible (refer to Exhibit Y). The noise levels at Coyote Springs SWA are expected to be comparable to the existing noise levels in this area. Therefore, there will be no significant impacts on important recreational opportunities in the analysis area from operation of the proposed Project.

Operational noise impacts on Hermiston Gun Club are considered negligible due to the nature of the recreational activity occurring at the site.

2.5 Traffic

OAR 345-021-0010(1)(t)(B)(iii): Increased traffic resulting from facility construction or operation.

2.5.1 Construction Traffic

The Project has the potential to result in short-term impacts on transportation from increased traffic generated by construction vehicles, as well as disruptions to traffic from potential single lane closures during line work (i.e., stringing line across the highway). Construction vehicles will access the analysis area via existing access roads and county, state, or private roads. Transport of construction materials and equipment into the analysis area from labor and material source locations would primarily occur on I-84, I-82, and Highway (Hwy) 730.

Coyote Springs SWA and Hermiston Gun Club are the only recreation sites for which a temporary traffic impact is likely because they are located off of I-84. Access to these recreational areas will experience higher traffic levels during construction, and visitor travel may

be disrupted or delayed for brief periods due to delivery of materials or construction equipment, and single lane closures during line work. These delays will occur sporadically and will be accompanied by traffic control teams. Potential impacts will be intermittent and temporary, and traffic levels will return to normal following construction. The temporary volume of construction-related traffic would represent a small increase in daily traffic compared to the annual daily trip volumes for roads in the analysis area, traffic impacts are therefore expected to be low (refer to Exhibit U). Traffic resulting from construction of the Project will not result in significant impacts to either site.

2.5.2 Operational Traffic

During Project operation, no increased traffic resulting from Project operation is anticipated because Project operations will not involve significant vehicle traffic (typically limited to approximately two vehicle trips per year). Therefore, traffic resulting from operation of the Project will not result in significant impacts.

2.6 Visual

OAR 345-021-0010(1)(t)(B) (iv) Visual impacts of facility structures or plumes.

2.6.1 Visual Impacts of Plumes

The Project will not generate air emissions or plumes. During construction, fugitive dust may be generated, but it will be localized, temporary, and easily mitigated by applying water to areas of surface disturbance from construction or operations of the Project.

2.6.2 Visual Impact of Facility Structures

Important recreational resources were evaluated for potential visual impacts associated with the Project using the scenic resources impact methodology provided in Exhibit R. The analysis area for this Exhibit T is the area within the Project site boundary and two miles, same as Exhibit R. Visual impacts are summarized below. Additional information is provided in Exhibit R.

2.6.3 Umatilla National Wildlife Refuge

Umatilla NWR Established in 1969 as mitigation for habitat lost through flooding from the construction of the John Day Dam. The approximate 23,555-acre refuge is a made up of waters, islands, shores, and uplands in and around the Columbia River. The natural and managed wetlands, mixed with native shrub-steppe, provide homes for an abundance of Columbia Basin species. The refuge attracts visitors, hunters, anglers, and birdwatchers.

Umatilla NWR is located on and around the Columbia River about 15 miles northwest of Hermiston, Oregon. The Project is within the middleground distance zone from Umatilla NWR located within the analysis area, approximately 1.7 miles (8,976 feet) north of the Project site boundary. The visual impact assessment indicates moderate to low potential for Project visibility. Intervening views consist of natural open space, agricultural land and uses, railroad tracks, Hwy 730, existing transmission lines, and the Hwy 730 Switchyard. There would be

views of the Project from various locations within NWR that would minimally affect the landscape character and visual quality of the site and surroundings; however, Project visibility, and views across agricultural, industrial uses, existing transmission lines and Hwy 730 indicate that the Project would not be a prominent feature in the viewshed. Views of the Project will not interfere with Umatilla NWR uses and will not compromise the purpose of the refuge. The effects would be a moderate to weak contrast, one that may attract attention but is co-dominate in the existing landscape because the setting is located in a wildlife area but is influenced by a built environment. Impacts would be moderate due to distance (middleground), intervening landscape features, and other built conditions occurring within the analysis area that limits visibility and viewing durations. Therefore, moderate to low impacts are anticipated that would not be significant from this location.

2.6.4 Coyote Springs State Wildlife Area

Coyote Springs SWA is situated along the Columbia River in the Columbia Basin. This wildlife area is open to wildlife-oriented public use compatible with the goals and objectives contained in the 2008 Columbia Basin Wildlife Area (OAR 635-008-0070). This wildlife area is located within an active agricultural area with railroad tracks to the north, I-84 to the south, and an existing transmission line transects the wildlife area. This wildlife area is walk-in access only; motor vehicle use restricted to the parking area and public access roads. The Project is within the middleground distance zone of the Coyote Springs SWA located within the analysis area, approximately 0.6 miles (3,168 feet) to west of the Project site boundary. Intervening views consist of natural open space (consisting of vegetation including trees and shrubs), agricultural uses, Hwy 730, existing transmission lines, and the Hwy 730 Switchyard. There would be views of the Project from various locations within the wildlife area that would affect the landscape character and visual quality of the site and surroundings; however potential views would be consistent with the existing surrounding environment. While Project elements may be visible, these elements would be perceived in massing, form, line, and texture. The Project components would cause moderate to weak contrasts that may attract attention but are co-dominate in the existing landscape views are influenced by a built environment. Impacts would be moderate to low because of distance (middleground), intervening vegetation and other built conditions occurring that limits visibility and viewing durations. Therefore, moderate to low impacts are anticipated that would not be significant from this location.

2.6.5 Hermiston Gun Club

The Hermiston Gun Club is located adjacent to the Project between I-84 on Gun Cub Road and situated between two sand and gravel extraction areas. Views from the site at to the former Umatilla Chemical Depot and associated railroad infrastructure, the extraction areas, the I-84 transportation infrastructure corridor, and nearby agricultural land uses. The Project would be prominent in the viewshed and cause strong visual contrasts, but the visual sensitivity of the site and viewing context of the adjacent infrastructure and extractive areas would cause only moderate impacts to recreationist using the site.

2.7 Mitigation

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

As described Section 2.4, implementation of the Project will not result in a significant, direct adverse impact on an important recreational opportunity in the analysis area. Disturbance relative to noise, traffic, or visual will not result in an indirect impact of an important or identified recreational opportunity. Therefore, no mitigation measures are proposed.

3.0 CONCLUSIONS

The analysis conducted in Exhibit T demonstrates that the design, construction, and operation of the Project will not result in significant adverse impacts to scenic resources and therefore complies with the recreational resource standard under OAR 345-022-0100.

4.0 COMPLIANCE CROSS-REFERENCES

Table T-2 identifies the location within the application for site certificate of the information responsive to the application submittal requirements OAR 345-021-0010, the Recreation Standard at OAR 345-022-0100, and the relevant Project Order provisions.

TABLE T-2. COMPLIANCE REQUIREMENTS AND RELEVANT CROSS-REFERENCES

REQUIREMENT	LOCATION
OAR 345-21-0010(1)(t)	
OAR 345-021-0010(1)(t) Information about the impacts the proposed facility would have on important recreational opportunities in the analysis area, providing evidence to support a finding by the Council as required by OAR 345-022-0100:	
(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.	Section 2.0
(B) Description of any significant potential adverse impacts to the important opportunities identified in (A) including, but not limited to: (i) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation; (ii) Noise resulting from facility construction or operation; (iii) Increased traffic resulting from facility construction or operation; (iv) Visual impacts of facility structures or plumes.	Section 2.4
(C) A description of any measures the applicant proposes to avoid, reduce or otherwise mitigate the significant adverse impacts identified in (B).	Section 2.7
(D) A map of the analysis area showing the locations of important recreational opportunities identified in (A)	Section 2.0 Figure T-1
(E) The applicant's proposed monitoring program, if any, for impacts to important recreational opportunities.	NA
OAR 345-022-0100 (Recreation)	
(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order. The Council shall consider the following factors in judging the importance of a recreational opportunity: (a) Any special designation or management of the location; (b) The degree of demand; (c) Outstanding or unusual qualities; (d) Availability or rareness; (e) Irreplaceability or irretrievability of the opportunity.	Section 2.3.1 Table T-1

5.0 REFERENCES

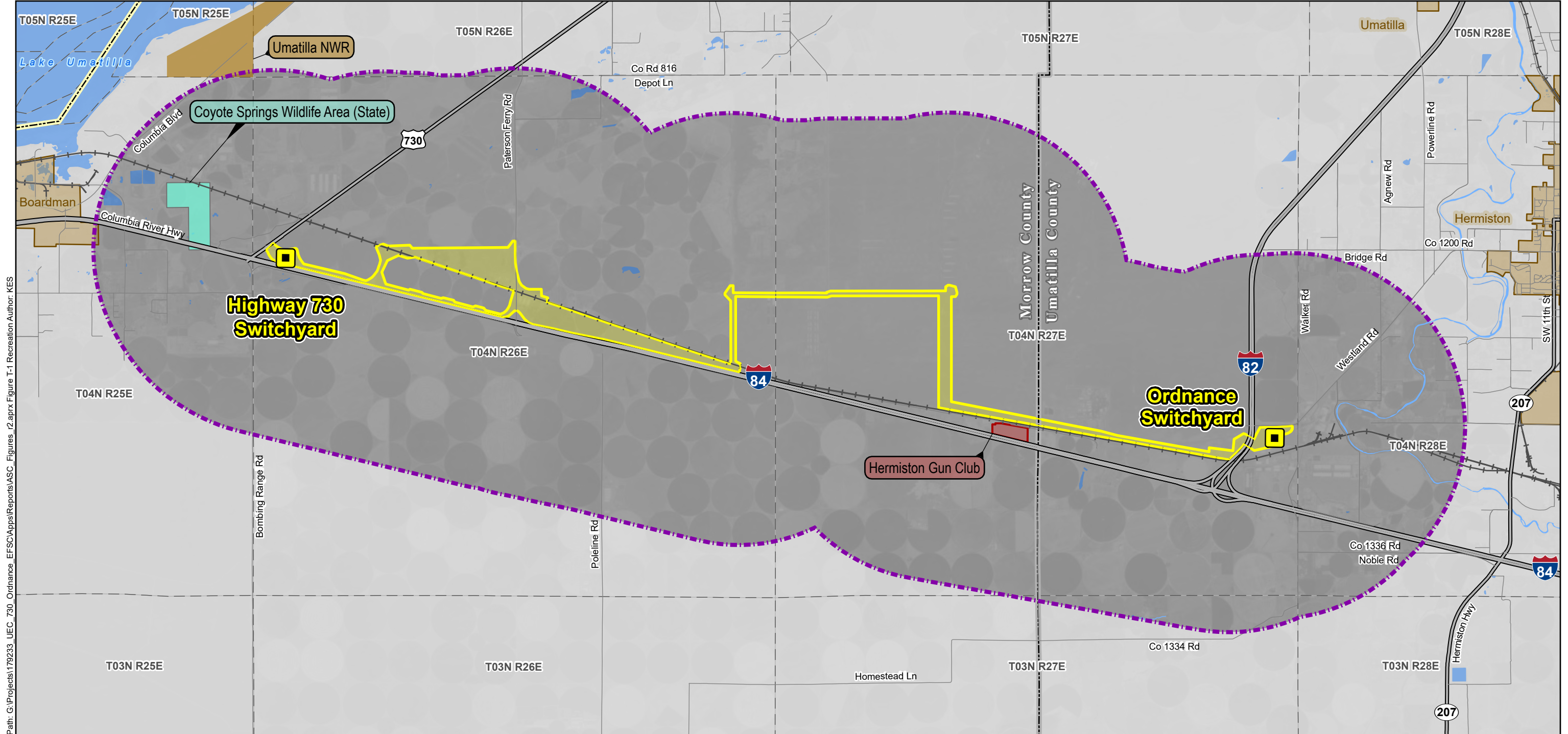
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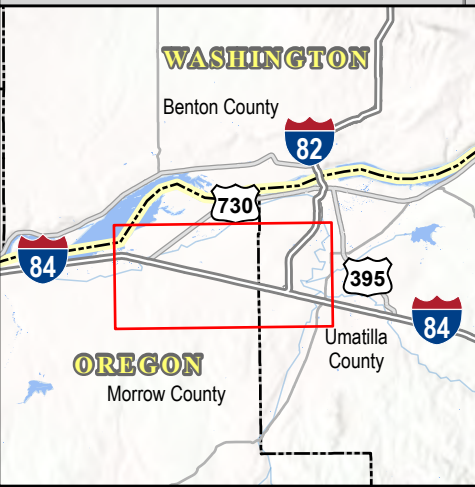
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United States Fish and Wildlife Service (USFWS). 2024. Available at: [Umatilla National Wildlife Refuge | U.S. Fish & Wildlife Service \(fws.gov\)](#). Accessed May 2024.

FIGURE T-1 RECREATION AREAS



Path: G:\Projects\179233_UEC_730_Ordinance_EFSC\Reports\Reports\ASC_Figures_12.aprx Figure T-1 Recreation Author: KES



- Project Components**
- Project Endpoint
 - Project Site Boundary
 - Recreation Analysis Area (2 miles)

- Recreation Areas**
- National Wildlife Refuge (NWR)
 - State Conservation Area
 - Private Recreation Area

- Transportation**
- Highway
 - Local Road
 - Railroad
- Water Resources (NHD)**
- River or Waterbody

- Boundaries**
- State
 - County
 - Township
 - Town Boundary

UMATILLA-MORROW COUNTY CONNECT PROJECT
APPLICATION FOR SITE CERTIFICATE

**Figure T-1
Recreation Areas**

0 1 2 3
Miles

N

POWER ENGINEERS
MEMBER OF WSP

UEC UMATILLA ELECTRIC COOPERATIVE

Date: 2/11/2025

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