

# Exhibit T

## Recreation

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### Wagon Trail Solar Project

#### January 2022

Prepared for

**NEXTera<sup>®</sup>**  
**ENERGY**   
RESOURCES

Prepared by



**Tetra Tech, Inc.**

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## Acronyms and Abbreviations

Applicant	Wheatridge East Wind, LLC c/o NextEra Energy Resources, LLC
Facility	Wagon Trail Solar Project
NPS	National Park Service
OAR	Oregon Administrative Rule
ONHT	Oregon National Historic Trail
OPRD	Oregon Parks and Recreation Department
OR	Oregon Route
ZVI	zone of visual influence

## 1.0 Introduction

Wheatridge East Wind, LLC c/o NextEra Energy Resources, LLC (Applicant) proposes to construct and operate the Wagon Trail Solar Project (Facility), a solar energy generation facility and related or supporting facilities in Morrow County, Oregon. This Exhibit T was prepared to meet the submittal requirements in Oregon Administrative Rule (OAR) 345-021-0010(1)(t).

## 2.0 Analysis Area

*OAR 345-021-0010(1)(t)(D) A map of the analysis area showing the locations of important recreational opportunities identified in (A).*

The analysis area for recreational resources is defined in the Project Order as “the area within and extending 5 miles from the site boundary” (ODOE 2021). The site boundary is defined in detail in Exhibits B and C and is shown on Figure T-1.

## 3.0 Recreational Opportunities in the 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, 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.*

### 3.1 Inventory Methods

Recreational opportunities within the analysis area were identified through collection and review of existing published and unpublished information available from desktop research sources commonly used for recreation inventory efforts. Key types of information resources investigated for the inventory included:

- Geographic Information System files documenting recreational resources obtained from key recreation provider agencies, e.g., the Bureau of Land Management (BLM 2018), United States Forest Service (USFS 2019), United States Geological Survey (USGS 2018), Oregon Department of Fish and Wildlife (ODFW 2015), and Oregon Parks and Recreation Department (OPRD 2018);
- Land management agency planning documents;

- Comprehensive plans, park and recreation plans, and individual park master plans prepared by OPRD and by counties and municipal governments within the analysis area;
- Internet sites maintained by recreation provider agencies, including OPRD and county and city park departments (Morrow County 2020; OPRD 2020); and
- Internet sites maintained by various commercial entities, including sites providing general recreation and tourism information and sites applicable to specific private-sector recreation opportunities.

### **3.2 Resource Descriptions**

In general, recreation activities in the analysis area may consist of hiking, dispersed camping, bicycling, photography, game and bird hunting, and sightseeing. These activities also occur in numerous locations outside the analysis area, and therefore some of the recreational opportunities identified within the analysis area do not rise to the level of uniqueness or irreplaceability that is required by OAR 345-022-0100(1).

There are three identified recreational opportunities within the analysis area (Table T-1). These include the Blue Mountain Scenic Byway, a portion of the Oregon Trail, and the Oregon Trail Wells Spring Interpretive Site. Recreational opportunities within the analysis area are described below in order of federal, state, local, and private ownership/management.

Table T-1. Inventory of Recreational Opportunities in the Analysis Area

Recreational Opportunity	Responsible Entity	Distance to the Site Boundary (miles)		Description	Size or Distance	Importance Factors					Important Recreation Resource?
		Transmission Line	Solar Array (site boundary)			Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
<b>Federal</b>											
Oregon National Historic Trail Segments/Sites	National Parks Service and Oregon Historic Trails Advisory Committee	6.4	1.9	The Oregon Trail was one of the main overland migration routes on the North American continent, leading from locations on the Missouri River to the Oregon Country. A high-potential <sup>1</sup> trail segment has been identified, extending from the eastern boundary of the Boardman Bombing Range westward to Immigrant Road (NPS 1999).	Approx. 12.2 miles of high-potential trail segment in analysis area	National Historic Trail	Low	Most trail segments destroyed by agricultural use; interpretive information at the Oregon Trail Wells Spring Interpretive Site; public access to this high-potential trail segment restricted by federal and private ownership.	Intact evidence of trail route rare	Irreplaceable (intact segments only)	Yes
		6.3	1.4	The Oregon Trail Wells Spring Interpretive Site offers views of intact wagon ruts, a graveyard, and remains of a stage station along with informational signage (NPS 1999).	0.5 acre	National Historic Trail interpretive site	Low	Interpretive signage with historical information but no other facilities; views of intact wagon ruts; appears to be located on private land.	Intact evidence of trail route rare	Irreplaceable	Yes
<b>State</b>											
Blue Mountain Scenic Byway	Oregon Department of Transportation, Federal Highway Administration	7.7	4.3	Route starts at Heppner Junction on Interstate 84 and ends at Sumpter and Haines in Baker County. The route passes through agricultural land, forest land, near Oregon Trail segments, and several historic towns (USFS 1993).	Approx. 145 miles total; approx. 6.2 miles in analysis area	Oregon State Scenic Byway	Moderate	Entire route includes diverse scenery, historic towns, a national forest, rocky peaks, and streams; Oregon Route 74 is one of several highways through similar eastern Oregon landscapes.	Relatively common travel route in the north-central Oregon region	Somewhat Irreplaceable	Yes
1. High-potential segments are portions of a trail route that afford high-quality recreational experiences in areas that have greater than average scenic values or afford the opportunity to vicariously share the experience of the original trail users, while high-potential sites are specific locations with similar attributes. See Section 4.4.2.1 for additional background on this management designation.											

### ***3.2.1 Federal***

The National Park Service, in conjunction with the Oregon Historic Trails Advisory Committee, manages the remaining segments and important sites of the Oregon National Historic Trail (ONHT). The trail route passes approximately 1.9 miles north of the site boundary. The Oregon Trail Wells Spring Interpretive Site is a high-potential site located within the analysis area. Due to its rareness and historic importance, the ONHT and Oregon Trail Wells Spring Interpretive Site are considered important recreational resources.

### ***3.2.2 State***

There are no lands owned or managed by the State of Oregon within the analysis area except for state highway rights-of-way. Within the analysis area, Oregon Route (OR) 74 is designated as a part of the route of the Blue Mountain Scenic Byway. As a result of the designation, OR-74 is considered an important recreation resource, inviting travelers from afar and providing an economic boost to towns along the route.

### ***3.2.3 Local Governments and Special Districts***

Morrow County, cities, and special districts do not provide any recreation opportunities within the analysis area.

### ***3.2.4 Private***

No privately owned recreational opportunities were identified within the analysis area.

## **3.3 Importance Assessment**

Recreation opportunities identified within the analysis area were evaluated for importance based on the criteria outlined in OAR 345-022-0100. Specifically, the importance of each recreation opportunity was rated based on:

- Any special designation or management of the location;
- The degree of demand;
- Outstanding or unusual qualities;
- Availability or rareness; and
- Irreplaceability or irretrievability of the opportunity.

A recreation opportunity was determined to be important based on assessment of available information specific to each criterion and a qualitative balancing of the attributes for all five criteria for a given resource. The assessment of importance for each recreational opportunity identified was conducted on a case-by-case basis. A recreation opportunity was determined to be important

based on assessment of available information specific to each criterion and a qualitative balancing of the attributes for all five criteria for a given resource. For example, it is conceivable that a resource would have a special management designation and high use, but still be a common and replaceable opportunity without unique or outstanding qualities; in that instance, a determination that the opportunity was not important would be justifiable. Alternatively, an opportunity might have little or no management protection and low evident demand, but still be considered important because it was rare and/or irreplaceable.

Based on the importance criteria described above, all of the identified recreation resources have been determined to be important for the purposes of this application. These are:

- The high-potential segment of the ONHT and the one high-potential site, the Oregon Trail Wells Spring Interpretive Site; and
- The Blue Mountain Scenic Byway.

Table T-1 summarizes the importance assessment for all identified recreation resources in the analysis area. The potential for impacts to the important recreation resources as a result of the Facility is discussed in Section 4.

## 4.0 Impact Assessment

*OAR 345-021-0010(1)(t)(B) A description of any significant potential adverse impacts to the important opportunities identified in (A) including, but not limited to:*

The Applicant analyzed potential effects to important recreational opportunities in the analysis area to determine whether the Facility's design, construction, and operation, taking into account mitigation, will be likely to result in any significant adverse impacts.

### 4.1 Direct or Indirect Loss of Recreational Opportunity

*(i) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation.*

For a direct loss of opportunity to occur, the Facility would need to physically disturb the ground located within the affected recreational resource area. The Facility will not directly impact any identified recreation resource.

An indirect loss of opportunity could occur if 1) a recreational opportunity nearby the Facility would not be physically disturbed by construction activity but might need to be temporarily closed to public use in response to safety concerns; or 2) if development of the Facility were to so alter the environment of a recreational opportunity through indirect effects that it substantially adversely impacted the quality of the recreation experience at that site. For example, if the Facility were to destroy intact evidence of the ONHT in view of an interpretive site (which it does not), it could render the site meaningless in terms of its historic importance and value as a tourism resource.

Because all of the important recreation resources in the analysis area are located farther than one mile from the site boundary, indirect loss of opportunity for safety concerns is unlikely to occur. The indirect effects of the Facility, including traffic, noise, and visual impacts, are similarly unlikely to substantially impact any important recreation resource such that the resource will be considered lost.

Potential sources of indirect disturbance impacts to important recreational opportunities include noise, traffic, and changes in visual quality associated with the Facility.

## 4.2 Noise

### *(ii) Noise resulting from facility construction or operation.*

Exhibit X provides an assessment of the existing acoustical environment and anticipated Facility sound levels; the methodology for noise modeling is discussed in detail in that exhibit. Exhibit X describes sound level thresholds derived from the Oregon Department of Environmental Quality noise regulations (OAR 340-035-0035), which are used to assess the significance of impacts to noise sensitive properties. As defined in OAR 340-035-0035, “noise sensitive properties” are “real property normally used for sleeping, or normally used as schools, churches, hospitals or public libraries. Property used in industrial or agricultural activities is not noise sensitive property unless it meets the above criteria in more than an incidental manner.” None of the recreational resources within the analysis area are considered a noise sensitive property.

Construction activities associated with the Facility have the potential for localized noise on a temporary basis as construction activities progress through certain locations within the site boundary. Noise could result from the use of heavy machinery, such as heavy trucks, bulldozers, graders, and cranes. Noise from construction may be audible at the Oregon Trail Wells Spring Interpretive Site and the high-potential ONHT segment (1.4 miles and 1.9 miles from the site boundary, respectively); Facility noise levels along the trail will peak at the Oregon Trail Wells Spring Interpretive Site, the nearest point of the trail to the Facility. However, noise levels at these sites are anticipated to be indistinguishable from background noise (including existing wind projects; less than 30 decibels). The Blue Mountain Scenic Byway is even farther from the Facility, located over 4.3 miles away. Therefore, based on sound levels of the anticipated equipment for Facility construction and given that the closest importa®

nt recreational opportunity is nearly 1.4 miles away, construction noise will not likely be discernible from background noise levels at the important recreational opportunity sites. Additionally, pursuant to OAR 340-035-0035(5), noise from construction activities is exempt from the state Noise Standards.

There will be no significant operational noise from the solar panels themselves. However, there will be some limited noise from associated Facility components, including cooling equipment for the battery storage system and electrical equipment. Thus, operational noise is likely to attenuate to be indistinguishable from the background noise level since all of the important recreational sites are

located more than 1.4 miles away from the site boundary. Therefore, no significant noise impacts are expected from construction or operation.

### 4.3 Traffic

#### *(iii) Increased traffic resulting from facility construction or operation*

OAR 345-021-0010(1)(t) requires consideration of impacts to recreational resources from Facility-related traffic that could occur during construction or operation. Exhibit U provides information on construction traffic levels and typical travel routes for Facility truck and construction worker traffic. Based on the analysis provided in Exhibit U, traffic resulting from construction of the Facility will not result in significant impacts. Therefore, the construction traffic is not anticipated to result in a reduction of Level of Service on any roads that provide access to the important recreational resources identified in this exhibit. However, some roads near some recreational opportunities will experience higher traffic levels during construction, and visitor travel to some areas may be disrupted or delayed for brief periods due to delivery of Facility materials or construction equipment. Delays are most likely to occur only during deliveries of oversized loads, which will occur sporadically and will be accompanied by traffic control teams. These impacts will be intermittent and temporary, and traffic levels will return to normal following construction.

The only recreation site for which a temporary traffic impact is likely is the Oregon Trail Wells Spring Interpretive Site because it is accessed by roads that will also carry Facility construction traffic. Access to the Oregon Trail Wells Spring Interpretive Site from the east most likely involves travel on OR-207 and/or Bombing Range Road; both of these will carry Facility construction traffic. The Oregon Trail Wells Spring Interpretive Site can also be accessed from the west, via routes that will not carry Facility construction traffic, for example, from OR-74 via Immigrant Lane. Therefore, visitors to the Oregon Trail Wells Spring Interpretive Site will be able to use an alternative route that will not be affected by Facility construction traffic.

Timing patterns for construction-related traffic and recreational traffic will likely differ substantially. Construction traffic will primarily be dispersed throughout the business work week and primarily during commuter hours, whereas peak recreational traffic will be greatest during the weekend. During peak construction periods roads used for Facility construction traffic will see up to an estimated total of 100 truck trips per day (50 roundtrips). Therefore, the affected local roads will continue to function at a high level of service. The use of minor roads in the vicinity of the Oregon Trail Wells Spring Interpretive Site will be limited to a relatively brief period of time while the northern end of the Facility is constructed. Due to the low visitor numbers to the Oregon Trail Wells Spring Interpretive Site, the likelihood of significant delays for visitors is very low.

Other important and identified recreation resources are accessed primarily by roads that will not carry substantial amounts of Facility construction traffic and are therefore unlikely to experience any traffic impacts. Again, temporary, short-term delays are most likely to occur only during deliveries of oversized loads such as electrical infrastructure components, which will occur sporadically and will be accompanied by traffic control teams.

Although there will be no significant traffic impacts, given the potential minor temporary impact of construction traffic on visitors to important recreational opportunities, the Applicant plans to construct the Facility in phases and will develop a Construction Traffic Management Plan as part of the Road Use Agreement coordinated with the Morrow County Road Department and the Oregon Department of Transportation. Note that no traffic impacts on recreational opportunities were identified during construction of the Wheatridge Renewable Energy Facility (which has a partially overlapping site boundary), which would have had more construction traffic than the Facility, including slow-moving trucks, on the same roadways. Therefore, no significant adverse traffic impacts to recreational opportunities areas are anticipated from construction of the Facility.

The operational phase of the Facility will affect recreational opportunities only to the extent that operation and maintenance activities generate significant amounts of traffic. Typical operational traffic will be minimal, as the Facility will permanently employ only approximately three personnel (Exhibit U). Larger amounts of traffic will be generated only if Facility components will need significant repairs or replacement. In that event, some roads will experience higher traffic levels, and visitor travel to some areas may be disrupted or delayed for brief periods during delivery of materials or equipment. However, these impacts will be rare, intermittent, and temporary, and will not represent significant adverse impacts to any recreational resource in the area.

## **4.4 Visual**

*(iv) Visual impacts of facility structures or plumes.*

### **4.4.1 Visual Impact Assessment Methodology**

Visual impacts of the Facility are primarily related to views of the solar arrays. Evaluation of potential visual impacts to recreational opportunities echoes the methodology described in Exhibit L. No plumes would be generated by the Facility; therefore, no visual impacts from plumes will occur.

The solar array components are described in further detail in Exhibit B. The solar panels will be the most visible components of the solar arrays and will consist of solar module strings, mounted on single-axis tracker systems. The visibility of the solar arrays will depend primarily on topographic or other view obstructions and the distance from the viewer to the solar arrays. With a maximum height of 16 feet, the arrays will not be visible from sites lower in elevation than the area on which the array is constructed. From sites that are similar in elevation to the arrays, viewers will see only a line on the horizon, and not individual solar panels. Depending on the viewing distance, viewers at sites higher in elevation may have views of the panels, especially if the view direction is toward the angle at which the panel is tilted toward the sun.

To the extent possible, reflectivity of the solar arrays will be minimized. Antireflective coating will be used to reduce glare and the surface of the panels will have high transmittance to increase the amount of light reaching the PV cells. With these methods, the panels will be less reflective than a natural water body or a coated glass surface that is not antireflective.

In evaluating the visual impacts, the Applicant first determined whether the Facility would potentially be visible from each recreation resource area using digital bare-earth terrain modeling. The analysis began with a zone of visual influence (ZVI) analysis (also known as a viewshed or visibility analysis), using Esri ArcGIS software, to identify the areas from which the Facility solar arrays might be visible. It should be noted that this “bare-earth” modeling approach, based only on the effects of terrain on visibility, results in a conservative assessment of potential visibility. The model does not account for distance, lighting, weather, and atmospheric attenuation factors that diminish visibility under actual field conditions. A bare-earth analysis also does not account for the effects of vegetation or buildings, which will in practice block or screen views in some places. Figure T-2 shows the areas from which the solar arrays would potentially be visible.

The analysis discussion below includes consideration of the up to 0.6-mile-long associated transmission line for the Facility. However, given the line’s short length and background location over 6 miles from any important recreation resource (Table T-1), a separate ZVI was unwarranted. The analysis conservatively assumes potential visibility of the associated transmission line, discussed below.

#### ***4.4.2 Visual Impact Assessment Results***

The results of the ZVI analysis are presented on Figure T-2. Because of the low profile of the solar arrays and the terrain conditions in the area, the solar arrays will be blocked from view at many locations within the analysis area. Locations of potential visibility of any part of the solar arrays are concentrated in the central part of the analysis area, primarily within a radius of approximately 2 to 4 miles of the arrays. Patches of potential visibility are also located at greater distances to the Facility, except for the southwest where the solar arrays will be largely blocked from view by the terrain.

The ZVI analysis demonstrates that the solar arrays will not be visible from the Oregon Trail Wells Spring Interpretive Site or the Blue Mountain Scenic Byway due to intervening topography. Potential visibility of the transmission line from these two locations is most likely limited; if visible, the transmission line would introduce weak contrast with the surrounding modified landscape that includes wind turbines and other electrical infrastructure, and would not attract viewer attention. There would be potential visibility of some portions of the Facility’s solar panels from some locations along the Oregon Trail Route within the Boardman Bombing Range. Therefore, expected visual conditions for the ONHT in this part of the analysis area are discussed below.

Potential visibility is one of several factors in the assessment of visual impact to a recreation resource. Other factors to consider include the existing visual context, particularly other sources of visual contrast present within the view; the likely number and nature of visitors to a recreation area; and whether there is any management direction related to preservation of scenic quality, either within the recreation area or outside of it. Table T-2 (in Section 4.5) provides a summary of the visual impact assessment for the important recreation resources in the analysis area that are within 5 miles of the site boundary and are within or near areas of potential visibility.

#### 4.4.2.1 *Oregon National Historic Trail*

Congress designated the route of the Oregon Trail as a National Historic Trail in 1978, and the Oregon Historic Trails Advisory Committee was created to provide public input and advice to the National Park Service (NPS) on management of historic trails in Oregon. The National Historic Trail designation applies to a general, primary route (and two specified branches) extending approximately 2,000 miles from Independence, Missouri to Oregon City, Oregon. The Oregon Trail designation was intended to preserve the legacy of the westward immigration of settlers to the Oregon Territory, based on routes used from 1841 to 1848 (NPS 1999). In recognition of the intermittent evidence of many of the historic trail routes, the National Trails System Act provided for the identification of “high-potential sites and segments” along these routes, using specified criteria for historic significance, the presence of visible historic remnants, scenic quality, and relative freedom from intrusion. High-potential segments are portions of a trail route that afford high-quality recreational experiences in areas that have greater than average scenic values or afford the opportunity to vicariously share the experience of the original trail users, while high-potential sites are specific locations with similar attributes. Each site or segment must have the potential to interpret the trail’s historical significance and to provide opportunities for high-quality recreation.

The NPS (1999) management plan identifies a 12-mile Boardman Segment of the trail in Morrow County as a high-potential trail segment. This trail segment extends from the eastern edge of the Boardman Bombing Range in a southwest direction to Immigrant Lane and then parallels to road to the western edge of the range and continues to the west. Physical evidence of the trail, i.e., wagon ruts, is still present in much of this 12-mile corridor. However, approximately 7 miles of this segment are within the Boardman Bombing Range and inaccessible to the public except for a small area surrounding the Oregon Trail Wells Spring Interpretive Site; the remainder of the high-potential segment is on private lands to the west of the Bombing Range (most of which is managed by The Nature Conservancy as part of the Boardman Conservation Area) and is also not open to the public. Due to the restricted access to this high-potential trail segment, it is questionable whether this should be considered an important resource for recreation; however, its federal protection status, irreplaceability, and historical importance qualify it as important for the purposes of this analysis.

As previously found by the Energy Facility Siting Council for the adjacent Wheatridge Renewable Energy Facility (ODOE 2017), the overall visual impact of an energy facility on the ONHT would be negligible because there are virtually no viewers to be affected and the existing viewshed contains wind turbines and other industrial infrastructure. The visibility analysis for the Facility solar arrays demonstrates potential visibility along limited portions of the high-potential ONHT segment within the Boardman Bombing Range, which is not accessible to the public. The subject portion of the trail follows a northeast-southwest orientation and is located to the northwest of the Oregon Trail Wells Spring Interpretive Site. Given that the distance from the closest point to the site boundary is approximately 1.9 miles, and the up to 0.6-mile associated transmission line is at least 6.4 miles away, it is questionable whether any of the solar arrays or transmission line would be

noticeable to a viewer. If a part of the Facility were visible, the visual impact would be negligible because this portion of the high-potential trail segment is not accessible to viewers and existing wind turbines and other industrial infrastructure would dominate any visual contrast that might be created by the solar facility or associated transmission line. This is consistent with the Council's prior finding for the solar component of the Wheatridge Renewable Energy Facility that because of the distance between the important recreational opportunities and proposed components, as well as the existing intervening geographic features, the solar facility would not likely result in a significant or adverse visual impact (ODOE 2019). Furthermore, most of the high-potential trail segment is within the Boardman Bombing Range and is off-limits to the public, except for a small area surrounding the Oregon Trail Wells Spring Interpretive Site that is not within an area of potential visibility.

Although the high-potential ONHT segment is an important historic resource, it is neither considered nor managed as a significant or important scenic resource. The management plans for the Bombing Range (U.S. Navy 2012a, 2012b) do not address scenic resources; there is no management direction for preservation of views or scenic quality related to the lands on which the high-potential trail segment or the Facility are located. This segment of the Oregon Trail was nominated for listing in the National Register of Historic Places in 1978 by the U.S. Navy, with a recommendation for a corridor extending "200 feet on each side of the Trail in order to preserve the historic appearance of the lands adjacent to the Trail, plus the stagecoach station site and the graveyard" (NPS 1978). The Facility will not affect the visual quality within that corridor or on lands surrounding the stagecoach station and graveyard site.

## 4.5 Summary of Impacts

The Facility has been designed to avoid direct loss to all important and identified recreational opportunities (see Table T-2), and indirect disturbance effects will not lead to an indirect loss of any important or identified recreational opportunity. Due to their low visual profile, the solar arrays will have minimal, if any, visibility from any of the important recreational opportunities within the analysis area. Similarly, due to its short length, background distance from recreation sites, and context within an existing modified landscape that includes wind turbines as well as other electrical infrastructure, the Facility's associated transmission line will create minimal, if any, visible contrast from important recreational opportunities in the analysis area.

Most identified recreation resources will experience virtually no impact from the Facility. They are located where they will not be affected by Facility traffic; they are too far away to hear operational noise; and they already have the turbines of existing wind farms in view and will have limited or no views of the Facility that will adversely affect the visitor experience. Construction noise will not likely be discernible from background noise levels at the Blue Mountain Scenic Byway and negligible or minor traffic impacts are anticipated at the site during both construction and operation. The ONHT high potential segment and the Oregon Trail Wells Spring Interpretive Site will not receive Facility operational noise beyond what is heard as background noise. Facility solar arrays may be visible from limited portions of the ONHT segment, and would not be visible from

the Oregon Trail Wells Spring Interpretive Site. Only the Oregon Trail Wells Spring Interpretive Site has the potential to experience some minor traffic impacts during construction. Traffic impacts for this site will be limited to potential delays accessing the site rather than traffic at the site; any potential traffic impacts will be temporary and intermittent during construction, and unlikely to affect the level of use at this site.

**Table T-2. Summary of Impacts to Important Recreational Opportunities**

Recreational Opportunity	Direct or Indirect Loss of Opportunity?	Operational Noise Analysis Results	Potential Traffic Impacts	Potential Visual Impacts
Blue Mountain Scenic Byway	No	No audible noise	Negligible	Viewshed analysis indicates no potential visibility of solar arrays, therefore no visual impact; if visible at a background distance of 7.7 miles or greater, the 0.6-mile transmission line would introduce weak contrast with negligible impact given existing landscape modifications (i.e., wind energy facility and other electrical infrastructure); no conflict with management direction.
Oregon Trail high potential segment	No	Audible noise but indistinguishable from existing background noise	Negligible	Viewshed analysis indicates potential visibility of solar arrays along limited portions of the trail route within the Boardman Bombing Range, at a distance of 1.9 miles or more; if visible at a background distance of 6.4 miles or more, the 0.6-mile transmission line would introduce weak contrast with negligible impact; due to restricted access, no viewers are expected to be present, resulting in no overall visual impact; no conflict with management direction.
Oregon Trail Wells Spring Interpretive Site	No	Audible noise but indistinguishable from existing background noise	Negligible to Minor; potential short-term, intermittent access delays during construction, which would not create a significant adverse impact	Viewshed analysis indicates no potential visibility of solar arrays, therefore no visual impact; if visible at a background distance of 6.3 miles, the 0.6 transmission line would introduce weak contrast with negligible impact given existing landscape modifications (i.e., wind energy facility and other electrical infrastructure); no conflict with management direction.

## 5.0 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 4, the Facility will have no significant, direct adverse impact on any important recreational opportunity in the analysis area. Indirect disturbance effects associated with traffic, noise, or visual aspects of the Facility will not lead to an indirect loss of any important or identified recreational opportunity. Consequently, no mitigation measures are proposed to avoid, reduce, or otherwise mitigate significant adverse impacts.

## 6.0 Monitoring of Impacts

*OAR 345-021-0010(1)(t)(E) The applicant's proposed monitoring program, if any, for impacts to important recreational opportunities.*

Because construction and operation of the Facility will have no significant adverse impacts on important recreational opportunities in the analysis area, and no mitigation specific to recreation is warranted or proposed, no monitoring program for recreation is proposed.

## 7.0 Submittal Requirements and Approval Standards

### 7.1 Submittal Requirements

**Table T-3. Submittal Requirements Matrix**

Requirement	Location
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, 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.	Section 3.0
(B) A description of any significant potential adverse impacts to the important opportunities identified in (A) including, but not limited to:	Section 4.0
(i) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation.	Section 4.1
(ii) Noise resulting from facility construction or operation.	Section 4.2
(iii) Increased traffic resulting from facility construction or operation.	Section 4.3
(iv) Visual impacts of facility structures or plumes.	Section 4.4
(C) A description of any measures the applicant proposes to avoid, reduce or otherwise mitigate the significant adverse impacts identified in (B).	Section 5.0

Requirement	Location
(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.	Section 5.0

## 7.2 Approval Standards

**Table T-4. Approval Standard**

Requirement	Location
<b>OAR 345-022-0100 Recreation</b>	
(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:	Section 4.0
(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.	Table T-1
(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). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.	N/A

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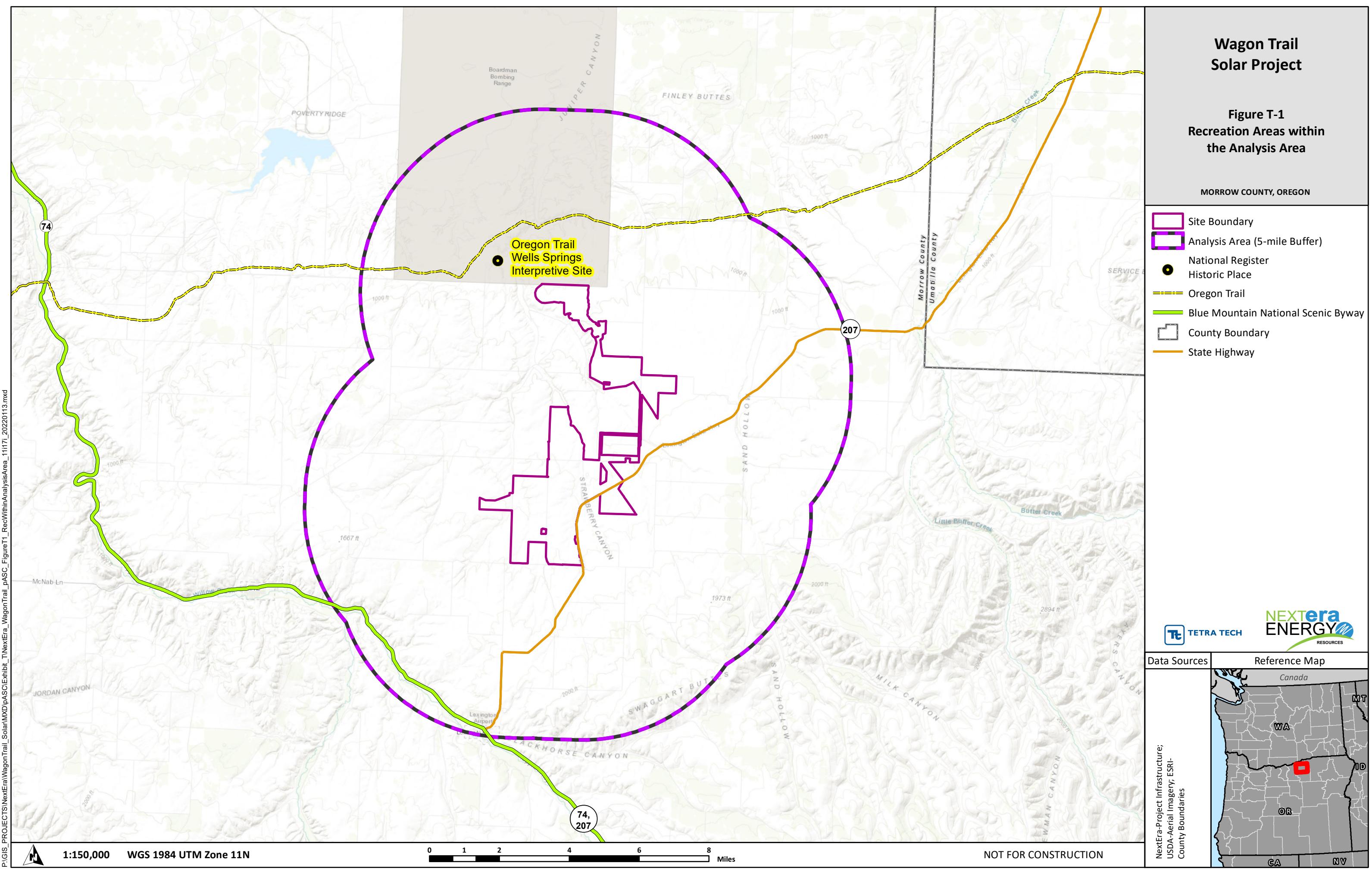
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# **Figures**



## Wagon Trail Solar Project

Figure T-2  
Recreation Areas within the  
Zone of Visual Influence

MORROW COUNTY, OREGON

- Site Boundary
- Analysis Area (5-mile Buffer)
- National Register Historic Place
- Oregon Trail
- Blue Mountain Scenic Byway
- Solar Array Not Visible
- Solar Array Potentially Visible
- County Boundary
- State Highway

Oregon Trail,  
Wells Springs  
Segment

Potential solar array visibility calculated using a 10 meter bare-earth digital elevation model with a solar fence line height of 16 feet (4.8 meters) and a viewing height of 6 feet (1.8 meters).

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1:150,000 WGS 1984 UTM Zone 11N

0 1 2 4 6 8 Miles

NOT FOR CONSTRUCTION

NextEra-Project Infrastructure;  
USDA-Aerial Imagery; ESRI-  
County Boundaries

TETRA TECH

NEXTERA  
ENERGY  
RESOURCES

