

Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit E. Protected Areas

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ACEC	Area of Critical Environmental Concern
Applicant	BGTF Speedway Project LLC
BESS	battery energy storage system
BPA	Bonneville Power Administration
BMP	best management practice
dBa	A-weighted decibels
Facility	Speedway Energy Facility
gen-tie	generation-tie
kV	kilovolt
LLC	limited liability company
MBTH	maximum blade tip height
NPDES	National Pollutant Discharge Elimination System
O&M	operations and maintenance
OAR	Oregon Administrative Rules
OR-#	Oregon Route [designation]
US-#	U.S. Route [designation]
WSA	Wilderness Study Area
ZVI	zone of visual influence

1.0 Introduction

BGTF Speedway Project LLC (Applicant) proposes construction and operation of the Speedway Energy Facility (Facility), a renewable energy facility incorporating wind, solar, and battery energy storage, located on privately owned land in unincorporated Sherman County, Oregon. The Facility's proposed point of interconnection to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt (kV) Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary.

The information contained herein supports demonstration of compliance with the Protected Areas approval standard for Oregon Administrative Rules (OAR) 345-022-0040.

2.0 Analysis Area

In accordance with OAR 345-001-0010(35)(e) (and as defined in the Project Order [ODOE 2026]), the analysis area for protected areas is the area within and extending 20 miles from the site boundary (Figure E-1; ODOE 2026). The site boundary is defined in detail in the Background Information Exhibit and is shown on Figure E-1.

3.0 Protected Areas Inventory – OAR 345-022-0040(4)(a)(b)

(4) To assist the Council in determining whether the standard outlined in (1) through (3) has been met, the Applicant must submit information about the potential impacts of the proposed facility on protected areas in the analysis area, providing evidence to support a finding by the Council as required by this rule, including:

(a) A list of all protected areas within the analysis area identifying:

(A) The distance and direction of the protected area from the proposed facility

(B) The basis for protection by reference to a specific subsection of OAR 345-001-0010(26); and

(C) The name, mailing address, phone number, and email address of the land management agency or organization with jurisdiction over the protected area.

(b) A map showing the location of the proposed facility in relation to the protected areas;

Attachment E-1 provides an inventory of the 20 protected areas within the analysis area and indicates the proximity and direction of each protected area relative to the Facility site boundary, the basis for protection by reference to applicable subsections of OAR 345-001-0010(26), and the contact information of the land management agency or organization with jurisdiction over each protected area. No protected areas are located within the site boundary. The inventory of protected areas was based on review of best available geographic information systems data, maps, and the

most current information for the categories of protected areas listed in OAR 345-001-0010(26) (BLM 2026a, 2026b, 2026c, 2026d, 2026e; Google Earth 2024; NOAA 2026; NPS 2026a, 2026b; National Wild and Scenic Rivers System 2026; ODFW 2026a, 2026b; OPRD 2020, 2026a, 2026b, 2026c, 2026d; OSU 2026a, 2026b; USFS 2026a, 2026b, 2026c; USFWS 2026a, 2026b; USGS 2024; Wilderness Connect 2026). These protected areas are identified by name on Figure E-1.

4.0 Potential Impacts – OAR 345-022-0040(4)(c)

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

4.1 Noise Impacts – OAR 345-022-0040(4)(c)(A)

(A) Noise resulting from facility construction or operation;

Noise would be generated during both construction and operation of the Facility. Exhibit O-3 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 O-3 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.”

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. Based on sound levels of the anticipated equipment for Facility construction, construction noise would attenuate to be indistinguishable from the background/ambient noise levels (including existing energy facilities; minimum of 26 A-weighted decibels [dBA]) from a distance of approximately 4.8 miles from the site boundary. Five of the protected areas are within 4.8 miles of the site boundary (Lower Deschutes Wild and Scenic River, Lower John Day Wilderness Study Area (WSA), Lower Deschutes State Scenic Waterway, Lower Deschutes Wildlife Area, and Columbia Basin Agricultural Research Center) and are projected to receive up to 30 decibels, at the loudest, at the outer borders of the protected areas, i.e., the closest portions to the turbines, substations, and battery energy storage system (BESS); this sound level is approximately equivalent to less than that of a whisper. Note that two of these protected areas would be considered noise sensitive properties, the Lower Deschutes Wild and Scenic River and John Day State Scenic Waterway, due to overnight camping opportunities being present onsite. These protected areas are not anticipated to be significantly impacted by Facility construction noise, which would be temporary, with elevated noise levels occurring intermittently where Facility infrastructure located closest to these resources is being built. As construction progresses elsewhere in the Facility, noise

levels would drop to background levels. Additionally, pursuant to OAR 340-035-0035(5), noise from construction activities is exempt from the state Noise Standards.

As noted in Exhibit O-3, sound generated by an operating turbine includes both mechanical sound and aerodynamic sound. The dominant noise component for wind farms is aerodynamic sound, which refers to the sound produced by air flow around the turbine blades and the tower. There would be no significant operational noise from the solar panels themselves; besides the wind turbines, there would be some limited noise from associated facilities, including cooling equipment associated with the BESS and electrical equipment. Based on sound levels of the turbines and anticipated equipment for Facility operation, operational noise would attenuate to be indistinguishable from the background/ambient noise levels within approximately 1.2 miles from the site boundary. All protected areas are located more than 1.2 miles from the site boundary, where noise from the Facility would be effectively indistinguishable from both daytime and nighttime projected background/ambient sound levels. The closest protected area is the Lower John Day WSA, located over 3.2 miles from the site boundary (and approximately 4.0 miles to the nearest turbine, 3.2 miles to the solar array, and 4.7 miles to the aboveground collection line). Modeled worst-case operational noise levels at the Lower John Day WSA would be no more than 10 dBA. The worst-case noise level of 10 dBA is significantly below rural ambient background noise level. The audible operations noise would not interfere with the primary purpose of this site, which is generally for wildlife habitat conservation and is only accessible by boat from the John Day River (BLM 2026f, 2026g). Therefore, the protected areas would not be affected by Facility turbine operation or other Facility noise. Attachment E-1 provides a summary of operational noise levels from the Facility at protected areas within the analysis area.

4.2 Traffic Impacts – OAR 345-022-0040(4)(c)(B)

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

Traffic impacts are addressed in greater detail in Exhibit L, which provides additional information on anticipated traffic volumes, peak construction traffic times, potential delays, and temporary road closures; mitigation measures that could be implemented by the Applicant and the construction contractor to avoid significant traffic impacts; and required coordination with the Oregon Department of Transportation and county road officials for necessary road improvements (if applicable), road closures, and permits for construction and oversized load movements.

No significant traffic impacts to protected areas are anticipated from Facility construction. All of the protected areas could have temporary traffic impacts during construction because they are accessed by roads that would also carry Facility construction traffic. The Columbia River Gorge National Scenic Area, Deschutes River State Recreation Area, and Heritage Landing can be accessed directly from I-84. The John Day Wild and Scenic River, Lower John Day WSA, Thirtymile WSA, North Pole Ridge WSA, Armstrong Canyon ACEC, Ferry Canyon ACEC, Cottonwood Canyon State Park, John Day State Scenic Waterway, Lower Deschutes Wildlife Area (i.e., the northern portion near I-84), and Columbia Basin Agricultural Research Center can be accessed via US-97 (i.e., the segment south of I-84 nearly to the US-197 intersection). Construction truck and commuter traffic

(occurring during the peak early morning and evening hours) would exit off of US-97 near Grass Valley and travel on local roads to access the Facility (which is directly adjacent to US-97); some additional commuter traffic could come from the south on US-97. However, a majority of the visitor traffic to the aforementioned protected areas is anticipated to immediately exit off US-97 to travel southeast on OR-206 to other state and local roads. This is the primary route to access this segment of the John Day River within the analysis area; otherwise, three of the protected areas along the John Day River are only accessible by boat (i.e., the Lower John Day WSA, Thirtymile WSA, North Pole Ridge WSA; BLM 2026a, BLM 2026e, BLM 2026g). Additionally, from the south, visitor traffic could also access resources along the John Day River by exiting immediately off US-97 to OR-293 and OR-218 to travel east to the river, therefore avoiding Facility construction travel routes. Thus, the aforementioned protected areas are anticipated to only be impacted for a short 9-mile segment of US-97 (i.e., the segment from I-84 south to OR-206), in which access disruptions or delays may be experienced for brief periods due to delivery of Facility materials or construction equipment. These impacts would be intermittent and temporary, and traffic levels would return to normal following construction, which is anticipated occur across 30 months. Additionally, construction worker traffic may occur on roads providing access to these areas; however, construction worker traffic would be dispersed on many roads in the area, rather than concentrated on any one road. Note that construction traffic would primarily be dispersed throughout the business work week and concentrated during commute hours, whereas peak recreational traffic is greatest during the weekend. Delays are most likely to occur only during deliveries of oversized loads, which would occur sporadically and would be accompanied by traffic control teams. Additionally, no roads providing access to protected areas are expected to be closed during construction or operation of the Facility.

Similarly, the White Wild and Scenic River, Lower Deschutes Wild and Scenic River, Columbia River Gorge National Scenic Area, White River Falls State Park, Lower Deschutes State Scenic Waterway, Lower Deschutes Wildlife Area (i.e., the southern portion near Tygh Valley), Tygh Valley State Natural Area, White River Wildlife Area, and Oak Springs Hatchery can be accessed via US-197 (i.e., the segment north of Dufur, Oregon nearly to the US-97 intersection) or OR-216 (i.e., the segment traveling west from US-97 to US-197, and the segment southwest of Maupin, Oregon). Note that construction truck traffic is not anticipated to utilize US-197 nor OR-216, but construction commuter traffic may, depending on origin. Commuter traffic would travel south on US-197 to Tygh Valley and exit onto OR-216 and local roads to access the Facility; some additional commuter traffic could come from the south on US-197 then northeast on US-97, utilizing the most direct route to the Facility. A majority of the visitor traffic to the aforementioned protected areas is anticipated to exit off US-197 at Tygh Valley, Oregon, either onto OR-216 or other local roads. Additionally, from the south, visitor traffic could also access resources along the Deschutes River by exiting off US-197 at Maupin, Oregon. Thus, the aforementioned protected areas are anticipated to experience access disruptions or delays during construction; however, these impacts would be intermittent and temporary, and traffic levels would return to normal following construction. As stated previously, construction commuter traffic may occur on roads providing access to these areas; however, construction commuter traffic would be dispersed on many roads in the area and would primarily

be dispersed throughout the business work week. The associated impacts would occur during commuter hours, when visitors are unlikely to visit the protected areas.

Although there would be no significant traffic impacts, given the potential minor temporary impact of construction traffic on visitors to protected areas, the Applicant plans to employ best management practices (BMPs) as described in Exhibit L to ensure that access restrictions to any protected area would be temporary and timed to avoid peak traffic flow. Additionally, the Applicant plans to develop a Construction Traffic Management Plan as part of the Road Use Agreement in consultation with the Sherman County Road Department. Therefore, no significant adverse traffic impacts to protected areas are anticipated from construction of the Facility.

The operational phase of the Facility would affect protected areas only to the extent that operations and maintenance (O&M) activities generate significant amounts of traffic. Typical operational traffic would be minimal, as the Facility would permanently employ up to 20 permanent on-site employees. Workers are assumed to reside in the Maupin, Tygh Valley, Grass Valley, or Madras/The Dalles areas. Occasional delivery trucks may also access the site to deliver routine office supplies to the O&M buildings. Therefore, during operations, an average of approximately 20 round-trip commuter trips per day would occur on weekdays (Monday-Friday). Larger amounts of traffic may be generated only if Facility components need significant repairs or replacement. In that event, some roads would 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 would be rare, intermittent, and temporary, and would not represent significant adverse impacts to any protected area in the vicinity.

4.3 Water Use and Wastewater Impacts – OAR 345-022-0040(4)(c)(C)(D)

(C) Water use during facility construction or operation;

No ground or surface water withdrawals would take place in a protected area or beyond those already permitted for existing water suppliers during construction (see Exhibit O-2). During operation, the Facility would have minimal water needs that are anticipated to be fulfilled through the use of exempt well(s) or another licensed water source. Therefore, water used during construction and operation would not impact water availability or use at protected areas. Water use for Facility construction and operation is discussed further in Exhibit O-2.

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

Wastewater generated by the Facility would include construction wastewater consisting of sanitary wastewater, equipment washwater and concrete washout water, operational wastewater produced at the O&M buildings and from washing solar panels, and site stormwater runoff (see Exhibits C, N, and O-2). Sanitation during construction activities would be addressed through the provision of portable toilets, including the use of holding tanks for biological waste that conform to OAR 340-071 and transportation of waste in accordance with Oregon Revised Statutes 466.005. Small amounts of wastewater would be generated from washdown of concrete trucks after concrete loads have been emptied. Concrete truck chutes would be washed down at each foundation site to

prevent the concrete from hardening within the chutes. Washdown methods would be determined by the contractor and may occur at contractor-owned batch plants or a designated concrete washout, and would meet the concrete washout requirements in Section 2.2.14 of the Oregon Department of Environmental Quality National Pollutant Discharge Elimination System (NPDES) 1200-C Construction Stormwater Discharge General permit. No water used for construction would be discharged into wetlands, streams, or other waterways.

Operational wastewater sources would include an on-site septic system within the O&M buildings that is licensed, operational, and maintained in compliance with state permit requirements and would have a discharge capacity of less than 2,500 gallons per day. Operation wastewater would also include maintenance activities associated with the solar array and potential periodic washing of the solar modules to minimize the effects of dust and dirt on energy production which would be dependent on weather conditions (e.g., during drought conditions when there is more dust the panels may require washing). The water used for array cleaning is not anticipated to require off-site disposal due to the extremely high evaporation rate and expected infiltration at the site. Any washwater would likely evaporate before it could be collected for transport off-site. Therefore, washwater would be evaporated or infiltrated into the ground. The Applicant would ensure that there is no runoff of washwater from the site or discharges to surface waters, storm sewers, or dry wells. No acids, bases, or metal brighteners would be used in the washwater and biodegradable, phosphate-free cleaners may be used sparingly.

During construction, stormwater runoff would be managed on-site according to the BMPs as described in the NPDES 1200-C permit and associated draft Erosion and Sediment Control Plan (see Exhibit C). Stormwater discharges would be managed in accordance with the NPDES 1200-C permit, and appropriate control measures would be installed to ensure compliance with the discharge and water quality requirements of the permit. During operations, the Facility may result in some changes to the stormwater drainage as a result of new impervious surfaces developed as part of this proposal (e.g., gravel roads, foundations for components, etc.). However, impervious surfaces would be a low percentage of the total Facility and most of the area within the site boundary would be vegetated, which would serve as a buffer to promote infiltration and minimize stormwater runoff.

4.4 Visual Impacts – OAR 345-022-0040(4)(c)(E)(F)

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

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

Visual impacts of the Facility are primarily related to views of the turbines, solar array, 230-kV aboveground collection line, and, to a lesser degree (due to being collocated or dispersed amongst taller Facility infrastructure), other facilities such as the 500-kV generation-tie (gen-tie) line, access roads, substations, O&M buildings, meteorological towers, BESS, fencing and gates, temporary workforce housing, and temporary construction areas. The Facility would not generate any

emissions plumes, so it would not cause any visual impacts from air emissions. Potential visual impacts due to dust created during construction would be largely prevented by following BMPs for dust control as detailed in Exhibit C and Exhibit O-2.

Class I areas consist of the 12 federally designated Wilderness Areas in Oregon defined in OAR 340-204-0050, none of which are located within the analysis area.

4.4.1 Visual Impact Assessment Methodology

In evaluating the visual impacts, the Applicant first determined whether the Facility would potentially be visible from each protected area using digital bare-earth terrain modeling. A “bare-earth” modeling approach, based only on terrain and excluding existing structures and vegetation, results in a highly 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. The analysis began with a zone of visual influence (ZVI) analysis (also known as a viewshed analysis), using Esri ArcGIS software, to identify the areas from which the Facility turbines, solar array, and aboveground collection line might be visible. Due to the size and siting of turbines on ridges to maximize the wind resource, the turbines are generally the most dominant visible feature compared to other facilities.

To assess the potential visibility of the structures, the ZVI analysis was performed for the turbines, solar array, and the 230-kV aboveground collection line (Figure E-2) with a viewer height assumed to be 1.75 meters (5.75 feet). The analysis assumed 110 percent of the maximum blade tip height (MBTH), utilizing the proposed MBTH of 213 meters (698 feet; taking into account both proposed and alternate turbine locations; Figure E-2.1), a maximum height of 12 feet for the solar arrays (Figure E-2.2); and a maximum height of 135 feet was assumed for the 230-kV aboveground collection line (Figure E-2.3). By using a MBTH that is 10 percent taller than the turbine being analyzed, the ZVI analysis indicates potential visibility beyond what would actually occur. In addition, in some areas where the analysis indicates Facility structures would be visible, the only visible components might be the tips of the turbine blades at MBTH, which would likely be noticeable only at relatively close viewing distances. Additionally, the number of visible turbines would generally be characterized as minimal (15 or fewer turbines potentially visible), low (16 to 30 turbines visible), or moderate (31 to 44 turbines visible), although viewing distance would be a significant factor in determining the overall level of visual impact.

Visibility of Facility infrastructure was defined by visible or not visible, indicated by color coding, and by proximity: foreground (less than 0.5 miles), middleground (0.5 to 5 miles), or background distances (more than 5 miles). The concept of distance zones can be used as a frame of reference to describe the characteristics of the visible landscape and the effects on scenery from human development and activities. Viewer distance and visual acuity are key factors in studying and determining visual effects, with perceived contrast and visual effects generally diminishing as distance between the viewer and the affected area increases. Distance zones (foreground, middleground, and background) provide a frame of reference for classifying the degree to which details of the viewed Facility would affect visual resources. The zones are defined by their distance

from the Facility site boundary. These zones establish a reference for evaluating how project details influence visual resources. They are defined by their distance from the Facility as follows (BLM 1986a):

- **Foreground/Middleground.** This distance zone (between 0 and 5 miles) is considered to be the range from which Facility component details would be visually clear (foreground) and where viewers still have the potential to distinguish individual forms, and texture and color are still identifiable, but become muted and less detailed (middleground).
- **Background.** Within this distance zone (between 5 miles and 15 miles), texture has disappeared, and color has flattened, making objects appear “washed out;” however, landform ridgelines are still distinguishable.
- **Seldom Seen.** This distance zone (beyond 15 miles) includes lands visible beyond the background distance or lands hidden from view from key locations.

Viewers are likely to perceive landscape features with greater clarity in foreground views, with clarity gradually diminishing toward the distant middleground. Within the background distance zone, forms, lines, and textures begin to blend into the surrounding landscape and colors generally appear more muted. Features located within the seldom-seen distance zone would be barely detectable.

The wind turbines would be the most visible component of the Facility due to their large-scale vertical structures, and the intensity of visibility would vary by viewing distance and location. In the foreground and middleground distance zones, the turbines would be readily discernible above the horizon, with turbine towers and rotor assemblies appearing as strong visual focal points. As viewing distance increases into the far middleground, the turbines would appear notably diminished in scale and less visually dominant, becoming subordinate to surrounding landscape features. From distant viewpoints, including the far background and seldom-seen distance zones, the wind turbines would be minimally visible or inconspicuous, generally appearing very small in scale, low on the horizon, and only faintly perceptible.

The solar array components are described in further detail in the Background Information Exhibit. The solar panels would be the most visible components of the solar arrays and would consist of solar module strings, mounted on single-axis tracker systems. The visibility of the solar arrays would depend primarily on topographic or other view obstructions and the distance from the viewer to the solar arrays. With a maximum height of 12 feet, the arrays would 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 are likely to perceive only a line on the horizon, and not individual solar panels, unless within the foreground distance zone. Depending on the viewing distance, viewers at sites higher in elevation may have views of the panels, becoming more noticeable when the view direction is toward the angle at which the panel is tilted toward the sun. To the extent practicable, reflectivity of the solar arrays would be minimized. Antireflective coating would be used to reduce glare and the surface of the panels would have high transmittance to increase the amount of light reaching the photovoltaic cells. With these methods, the panels would be less reflective than a natural water body or a coated glass surface that is not antireflective.

Where visible, the solar arrays and gen-tie structures would be subordinate to the visual character of the existing views, generally appearing as being absorbed into the broader landscape.

4.4.2 Visual Impact Assessment Results

Based on the results of the ZVI analysis, portions of the Facility would potentially be visible mostly at the background distance from 13 of the 20 protected areas in the analysis area (see Figures E-2.1, E-2.2, and E-2.3, and Attachment E-1).

Potential visibility is one of several factors that comprise an assessment of visual impact to a protected area. Other factors to consider include the existing visual character, particularly other sources of visual contrast present within the view; the likely number and nature of visitors to a protected area; and whether there is any management direction related to preservation of scenic quality, either within the protected area or outside of it. Attachment E-1 provides a summary of the visual impact assessment for each of the protected areas in the analysis area.

The proposed turbines would potentially be visible from 13 protected areas, the solar arrays would have potential visibility from 8 protected areas, and the aboveground collection line would have potential visibility from 5 protected areas. The visual impact is considered to be negligible for most protected areas, primarily due to their distance of 5.2 to 16 miles from the site boundary. Views of the Facility turbines, solar array, and aboveground collection line for all protected areas would therefore be at a background viewing distance where the apparent size of the Facility is greatly diminished, blending into the surrounding landscape, and the turbines, solar array, and aboveground collection line would occupy a limited portion of the total viewshed. Many of the protected areas currently have views of other renewable energy facilities, transmission lines, rural development, and agricultural irrigation equipment, so the Facility would not introduce a new or unusual feature to the view or alter the existing visual character. In addition, potential views of the Facility from some of the protected areas would be partially to fully screened by existing vegetation, terrain, and man-made structures.

The protected areas closest to the Facility—the Lower Deschutes Wild and Scenic River, Lower John Day WSA, Lower Deschutes State Scenic Waterway, and Lower Deschutes Wildlife Area—would have middleground views (or are within middleground distances with background visibility of the turbines/aboveground collector line: Lower Deschutes Wildlife Area) of the Facility. The following paragraphs provide a more in-depth visual impact assessment for these protected areas. Note that although the Columbia Basin Agricultural Research Center is within middleground distance from the Facility, the protected area would not have Facility visibility and is therefore not analyzed further.

4.4.2.1 Lower Deschutes Wild and Scenic River

At the Lower Deschutes Wild and Scenic River, the visual impact of the Facility is anticipated to be negligible. The viewshed analysis indicates up to a moderate number (31-44) of turbines would be visible depending on location at a middleground viewing distance of at least 4.4 miles (the

proximity to the closest turbine) along scattered sections of the river canyon rims/ridges (Figure E-2.1). The turbines would appear as thin vertical structures with rotating blades that would be noticeable but appear small in scale. The viewshed analysis also indicates potential visibility of the solar arrays at a middleground distance of 3.7 miles or greater along scattered sections of the river canyon rims/ridges (Figure E-2.2). Because the solar arrays would appear relatively low to the ground with a maximum height of 12 feet, if noticeable, they would not be distinct from this distance and would not obstruct or intrude upon views from the resource. Where visible, the arrays would appear as a dark line on the horizon. Both the turbines and solar arrays would create minimal visual contrast, which would be seen in context with existing landscape modifications, including existing utility infrastructure, rural development, and agricultural irrigation equipment. The viewshed analysis also indicates no visibility of the aboveground collector line due to terrain/geographical screening (Figure E-2.3). The Facility would not introduce a new or unusual feature to the view or alter the existing visual character. Note that due to topographical screening, potential Facility views are confined to the upper ridges of the Lower Deschutes River Canyon and the proposed Facility would not be visible from within the canyon, where most of the recreational opportunities are concentrated.

The portion of the Lower Deschutes River within the analysis area is part of the Lower Deschutes River Canyon, identified by the applicable federal management plan as well as by local plans as an important scenic resource where significant adverse visual impacts should be avoided (BLM 1986, Sherman County 2007, Wasco County 2022, Wasco County 2025; see Exhibit I). The river corridor is popular for its diverse recreational opportunities including fishing, camping, and rafting, and a railroad corridor (to the west) and Lower Deschutes River Back Country Byway (to the east; see Exhibit K) parallel the river within the canyon (BLM 2026f). Although the river would have some intermittent views of the Facility, visibility of the Facility is not anticipated to compromise the purpose of the river and would not result in significant adverse visual impacts on this protected area.

4.4.2.2 Lower John Day Wilderness Study Area

At the Lower John Day WSA, the visual impact of the Facility is anticipated to be negligible. The viewshed analysis indicates up to a moderate number (31 to 44) of turbines would be visible depending on location at a middleground viewing distance of at least 4.0 miles (the proximity to the closest turbine) along scattered sections of the WSA predominately along the John Day River Canyon rims/ridges (Figure E-2.1). The turbines would appear as thin vertical structures with rotating blades that would be noticeable but appear small in scale. The viewshed analysis also indicates potential intermittent visibility of the solar arrays at a middleground distance of 3.2 miles or greater along scattered sections of the WSA, predominately along the John Day River Canyon rims/ridges (Figure E-2.2). Because the solar arrays would appear relatively low to the ground with a maximum height of 12 feet, if noticeable, they would not be distinct from this distance and would not obstruct or intrude upon views from the resource. Where visible, the arrays would appear as a dark line on the horizon. Both the turbines and solar arrays would create minimal visual contrast, which would be seen in context with existing landscape modifications, including existing utility

infrastructure, rural development, and agricultural irrigation equipment. Additionally, the Facility's associated aboveground collection line may also be visible at a middleground distance of 4.7 miles or greater from the John Day River Canyon rims/ridges within the WSA (Figure E-2.3). If visible, the aboveground collection line would introduce thin vertical structures that would create minimal visual contrast in context with other existing similar electrical infrastructure in the viewshed. The Facility would not introduce a new or unusual feature to the view or alter the existing visual character. Note that due to topographical screening, potential Facility views are predominantly confined to the upper ridges of the John Day River Canyon within the WSA, and the proposed Facility would not be visible from within the canyon, where most of the recreational opportunities are concentrated.

A majority of the Lower John Day WSA is also within the John Day River Canyon and thus significantly overlaps with both the John Day Wild and Scenic River and John Day State Scenic Waterway (BLM 2026g). The WSA itself is not managed for scenic quality, but the portions of the WSA that are within the John Day River Canyon are identified by the applicable federal management plan as well as by local plans as an important scenic resource where significant adverse visual impacts should be avoided (BLM 1986, BLM 2015, Sherman County 2007, Wasco County 2022, Wasco County 2025; see Exhibit I). The only legal access (i.e., outside private property) to the WSA is by floating the John Day River, with two put-in points (one of which is located within the analysis area where OR-206 crosses the John Day River, downstream from the WSA); thus, public visitation and sight-seeing recreation opportunities are anticipated to be limited (BLM 2026g). Although the WSA would have some intermittent views of the Facility, visibility of the Facility is not anticipated to compromise the purpose of the WSA and would not result in significant adverse visual impacts on this protected area.

4.4.2.3 Lower Deschutes State Scenic Waterway

At the Lower Deschutes State Scenic Waterway, the visual impact of the Facility is anticipated to be negligible. The viewshed analysis indicates up to a moderate number (31 to 44) of turbines would be visible depending on location at a middleground viewing distance of at least 4.5 miles (the proximity to the closest turbine) along scattered sections of the waterway's canyon rims/ridges (Figure E-2.1). The turbines would appear as thin vertical structures with rotating blades that would be noticeable but appear small in scale. The viewshed analysis also indicates potential intermittent visibility of the solar arrays at a middleground distance of 3.7 miles or greater along scattered sections of the waterway canyon rims/ridges (Figure E-2.2). Because the solar arrays would appear relatively low to the ground with a maximum height of 12 feet, if noticeable, they would not be distinct from this distance and would not obstruct or intrude upon views from the resource. Where visible, the arrays would appear as a dark line on the horizon. Both the turbines and solar arrays would create minimal visual contrast, which would be seen in context with existing landscape modifications, including existing utility infrastructure, rural development, and agricultural irrigation equipment. The viewshed analysis also indicates no visibility of the aboveground collector line due to terrain/geographical screening (Figure E-2.3). The Facility would not introduce a new or unusual feature to the view or alter the existing visual character. Note that

due to topographical screening, potential Facility views are confined to the upper ridges of the Lower Deschutes River Canyon, and the proposed Facility would not be visible from within the canyon, where most of the recreational opportunities are concentrated.

The Lower Deschutes State Scenic Waterway is also contained within the Lower Deschutes River Canyon and thus significantly overlaps with the Lower Deschutes Wild and Scenic River (OPRD 2026d). This portion of the Lower Deschutes River is part of the Lower Deschutes River Canyon, identified by the applicable federal management plan as well as by local plans as an important scenic resource where significant adverse visual impacts should be avoided (BLM 1986, Sherman County 2007, Wasco County 2022, Wasco County 2025; see Exhibit I). Similar to the Lower Deschutes Wild and Scenic River, recreational opportunities include water-associated activities, camping, and a railroad corridor (to the west) and Lower Deschutes River Back Country Byway (to the east; see Exhibit K) parallel the river within the canyon (BLM 2026f). Although the waterway would have some intermittent views of the Facility, visibility of the Facility is not anticipated to compromise the purpose of the waterway and would not result in significant adverse visual impacts on this protected area.

4.4.2.4 Lower Deschutes Wildlife Area

At the Lower Deschutes Wildlife Area, the visual impact of the Facility is anticipated to be negligible. The viewshed analysis indicates up to a moderate number (31 to 44) of turbines would be visible depending on location at a background viewing distance of at least 5.9 miles (the proximity to the closest turbine) within scattered sections of the Wildlife Area (Figure E-2.1). The turbines would appear as thin vertical structures with rotating blades that would be noticeable but appear small in scale. The viewshed analysis also indicates potential intermittent visibility of the solar arrays at a middleground distance of 4.8 miles or greater within scattered sections of the wildlife area (Figure E-2.2). Because the solar arrays would appear relatively low to the ground with a maximum height of 12 feet, if noticeable, they would not be distinct from this distance and would not obstruct or intrude upon views from the resource. Where visible, the arrays would appear as a dark line on the horizon. Both the turbines and solar arrays would create minimal visual contrast, which would be seen in context with existing landscape modifications, including existing utility infrastructure, rural development, and agricultural irrigation equipment. Additionally, the Facility's associated aboveground collection line may also be visible at a background distance of 6.1 miles or greater from scattered portions of the wildlife area (Figure E-2.3). If visible, the aboveground collection line would introduce thin vertical structures that would create minimal visual contrast in context with other existing similar electrical infrastructure in the viewshed. The Facility would not introduce a new or unusual feature to the view or alter the existing visual character.

A majority of the Lower Deschutes Wildlife Area is also within the Lower Deschutes River Canyon and thus significantly overlaps with both the Lower Deschutes Wild and Scenic River and Lower Deschutes State Scenic Waterway (ODFW 2026c). The wildlife area itself is not managed for scenic quality (ODFW 2021), but the portions of the wildlife area that are within the Lower Deschutes River Canyon are identified by the applicable federal management plan as well as by local plans as

an important scenic resource where significant adverse visual impacts should be avoided (BLM 1986, Sherman County 2007, Wasco County 2022, Wasco County 2025; see Exhibit I). The wildlife area is a popular attraction for water recreation (e.g., fishing and boating), hunting (both big game and upland birds), biking and hiking (ODFW 2026c). Although the wildlife area would have some intermittent views of the Facility, visibility of the Facility is not anticipated to compromise the purpose of the wildlife area and would not result in significant adverse visual impacts on this protected area.

5.0 Materials Analysis – OAR 345-022-0040(4)(d)

(d) A materials analysis, including:

(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;

(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and

(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.

The materials analysis for the Facility can be found in Section 5.3 of the Background Information Exhibit.

6.0 Conclusions

The analysis area contains all or part of 20 protected areas. The Applicant analyzed potential impacts to these areas and concluded as follows:

- **Noise.** Due to the distance between the protected areas and the Facility, construction noise would be audible at five of the protected areas (Lower Deschutes Wild and Scenic River, Lower John Day WSA, Lower Deschutes State Scenic Waterway, Lower Deschutes Wildlife Area, and Columbia Basin Agricultural Research Center), with sound levels equivalent or less than the sound level of a whisper (up to 30 decibels). Construction noise would also be short-term and intermittent, thus, significant noise impacts from construction are not anticipated. Operational noise would attenuate to be indistinguishable from the background/ambient noise levels at all protected areas. Noise modeling presented in Exhibit O-3 further supports these findings.
- **Traffic.** Facility-related traffic volumes would not be sufficiently high or located so as to significantly impact protected areas. Construction traffic is not likely to cause short-term, intermittent delays or increased congestion along roads used to access the protected areas; impacts (if any) would be temporary and traffic conditions would return to typical low levels following construction. With implementation of BMPs and implementation of a

Construction Traffic Management Plan as part of the Road Use Agreement coordinated with the Sherman County Road Department, there would be no significant adverse traffic impacts to protected areas resulting from the construction or operation of the Facility.

- **Water.** The Facility would not use water sourced from a protected area. Therefore, there would be no significant impacts to protected areas by water use at the Facility.
- **Wastewater.** The Facility would not discharge wastewater to a protected area. Therefore, there would be no significant impacts to protected areas due to wastewater generated at the Facility.
- **Visual.** The Facility would be potentially visible from 13 of the 20 protected areas in the analysis area. However, due to distance from the Facility, topographic obstructions, other similar existing features within view, low user numbers, and an overall lack of management directives (i.e., that apply to maintaining scenic quality outside the protected areas' boundaries), the Facility would not create notable changes to the existing landscape character or quality. The Facility would not have a significant adverse visual impact on any protected area.

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8.0 Approval Standards and Submittal Requirements

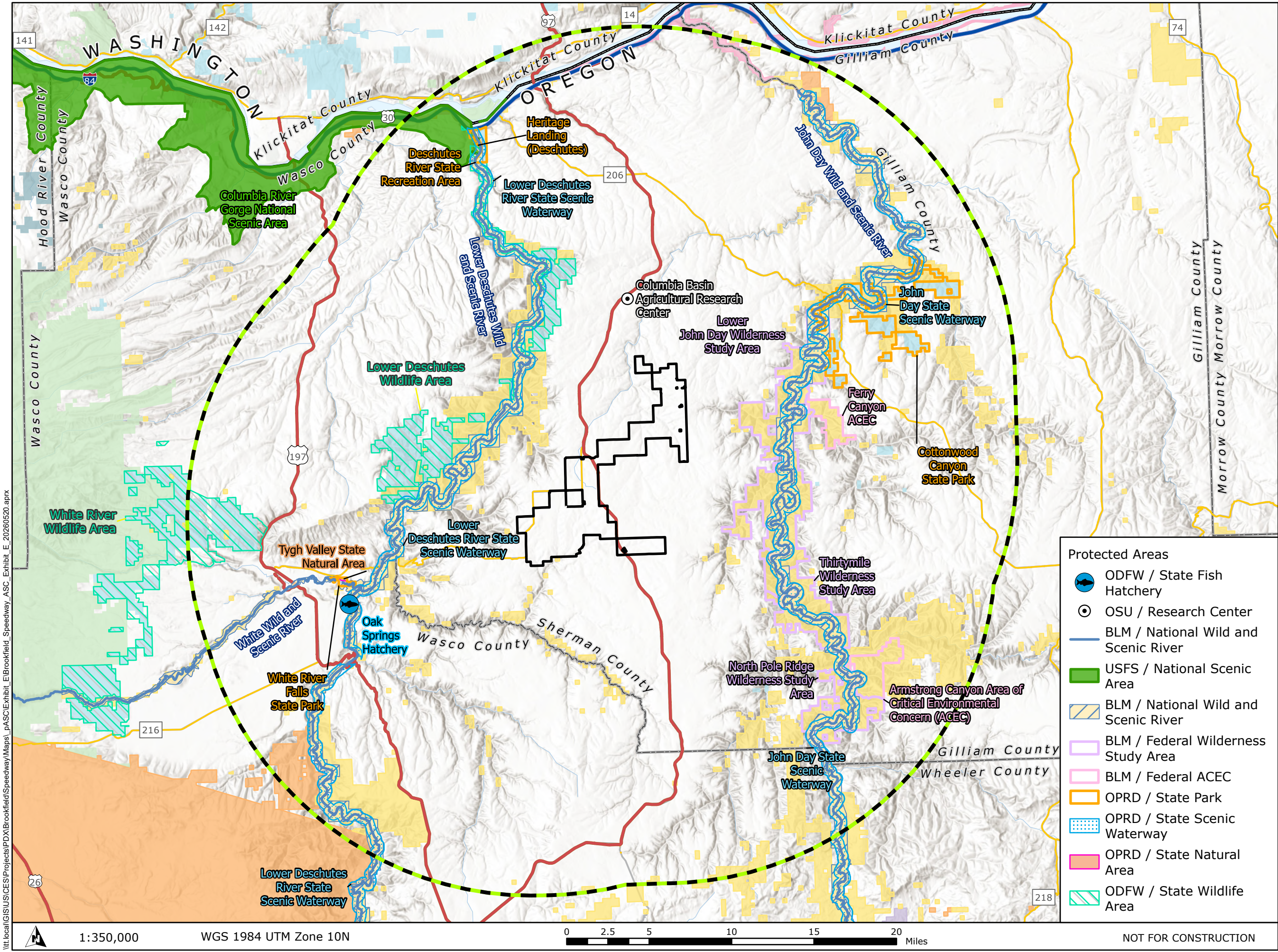
Table E-1. Approval Standards and Submittal Requirements Matrix

Requirements	Location
OAR 345-022-0040 Protected Areas	
Approval Standards	
(1) To issue a site certificate, the Council must find:	–
(a) The proposed facility will not be located within the boundaries of a protected area designated on or before the date the application for site certificate or request for amendment was determined to be complete under OAR 345-015-0190 or 345-027-0363;	N/A
(b) The design, construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impact to a protected area designated on or before the date the application for site certificate or request for amendment was determined to be complete under OAR 345-015-0190 or 345-027-0363.	Sections 3.0 through 6.0
(2) Notwithstanding section (1)(a), the Council may issue a site certificate for:	–
(a) A facility that includes a transmission line, natural gas pipeline, or water pipeline located in a protected area, if the Council determines that other reasonable alternative routes or sites have been studied and that the proposed route or site is likely to result in fewer adverse impacts to resources or interests protected by Council standards; or	N/A
(b) Surface facilities related to an underground gas storage reservoir that have pipelines and injection, withdrawal or monitoring wells and individual wellhead equipment and pumps located in a protected area, if the Council determines that other alternative routes or sites have been studied and are unsuitable.	N/A
(3) The provisions of section (1) do not apply to:	–
(a) A transmission line routed within 500 feet of an existing utility right-of-way containing at least one transmission line with a voltage rating of 115 kilovolts or higher; or	N/A
(b) A natural gas pipeline routed within 500 feet of an existing utility right of way containing at least one natural gas pipeline of 8 inches or greater diameter that is operated at a pressure of 125 psig.	N/A
Submittal Requirements	

Preliminary Application for Site Certificate
Exhibit E. Protected Areas

Requirements	Location
(4) To assist the Council in determining whether the standard outlined in (1) through (3) has been met, the Applicant must submit information about the potential impacts of the proposed facility on protected areas in the analysis area, providing evidence to support a finding by the Council as required by this rule, including:	-
(a) A list of all protected areas within the analysis area identifying:	Section 3.0, Attachment E-1
(A) The distance and direction of the protected area from the proposed facility	Attachment E-1
(B) The basis for protection by reference to a specific subsection of OAR 345-001-0010(26); and	Attachment E-1
(C) The name, mailing address, phone number, and email address of the land management agency or organization with jurisdiction over the protected area.	Attachment E-1
(b) A map showing the location of the proposed facility in relation to the protected areas;	Figure E-1
(c) A description of significant potential impacts of the proposed facility, if any, on the protected areas including, but not limited to, potential impacts such as:	Attachment E-1, Section 4.0
(A) Noise resulting from facility construction or operation;	Attachment E-1, Section 4.1
(B) Increased traffic resulting from facility construction or operation;	Section 4.2
(C) Water use during facility construction or operation;	Section 4.3
(D) Wastewater disposal resulting from facility construction or operation;	Section 4.3
(E) Visual impacts of facility structures or plumes, including, but not limited to, changes in landscape character or quality; and	Attachment E-1, Figures E-2.1, E-2.2, E-2.3, Section 4.4
(F) Visual impacts from air emissions resulting from facility construction or operation, including, but not limited to, impacts on Class 1 Areas as described in OAR 340-204-0050.	Section 4.4
(d) A materials analysis, including:	Section 5.3 of the Background Information Exhibit
(A) An inventory of substantial quantities of industrial materials flowing into and out of the proposed facility during construction and operation;	Section 5.3 of the Background Information Exhibit
(B) The applicant's plans to manage hazardous substances during construction and operation, including measures to prevent and contain spills; and	Section 5.3 of the Background Information Exhibit
(C) The applicant's plans to manage non-hazardous waste materials during construction and operation.	Section 5.3 of the Background Information Exhibit
EFSC 4-2026, amend filed 04/23/2026, effective 04/23/2026	

Figures



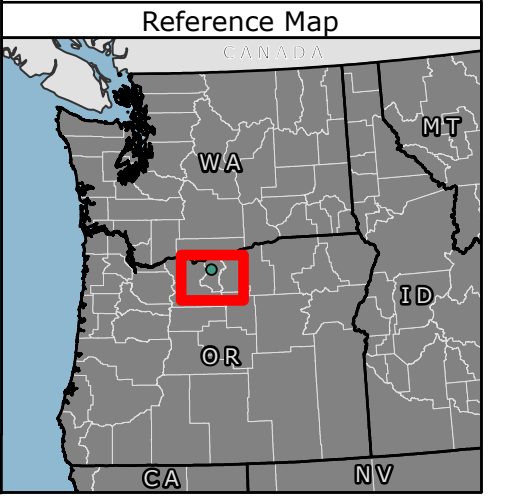
Speedway Energy Facility

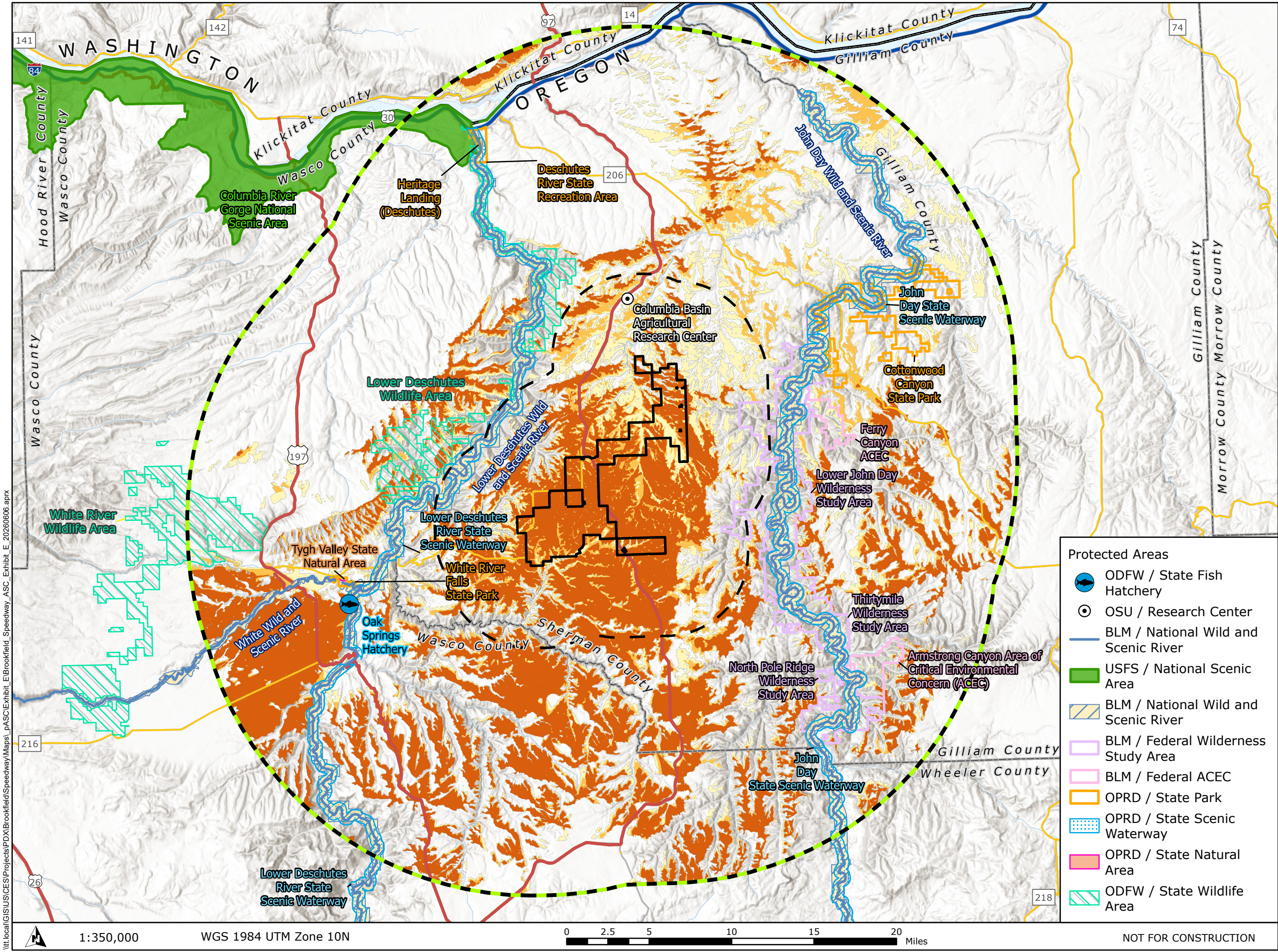
Figure E-1
Protected Areas within the Analysis Area

SHERMAN COUNTY, OR

- Site Boundary
- Study Area (20-mile Buffer)
- State Boundary
- County Boundary
- Interstate Highway
- US Highway
- State Highway
- Management Agency
 - Department Of Defense (DOD)
 - Bureau of Land Management (BLM)
 - National Park Service (NPS)
 - US Forest Service (USFS)
 - Bureau of Indian Affairs (BIA)
 - State Land
 - Local

- Protected Areas
- ODFW / State Fish Hatchery
 - OSU / Research Center
 - BLM / National Wild and Scenic River
 - USFS / National Scenic Area
 - BLM / National Wild and Scenic River
 - BLM / Federal Wilderness Study Area
 - BLM / Federal ACEC
 - OPRD / State Park
 - OPRD / State Scenic Waterway
 - OPRD / State Natural Area
 - ODFW / State Wildlife Area





Speedway Energy Facility

**Figure E-2.1
Protected Areas
Turbine Viewshed**

SHERMAN COUNTY, OR

Legend:

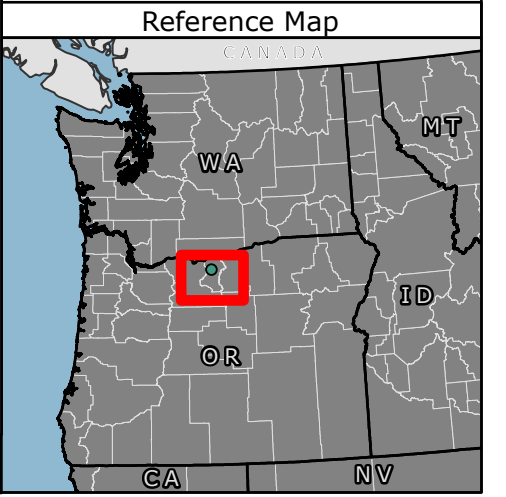
- Site Boundary
- Study Area (20-mile Buffer)
- 5-miles
- State Boundary
- County Boundary
- Interstate Highway
- US Highway
- State Highway

Number of Turbines Visible*

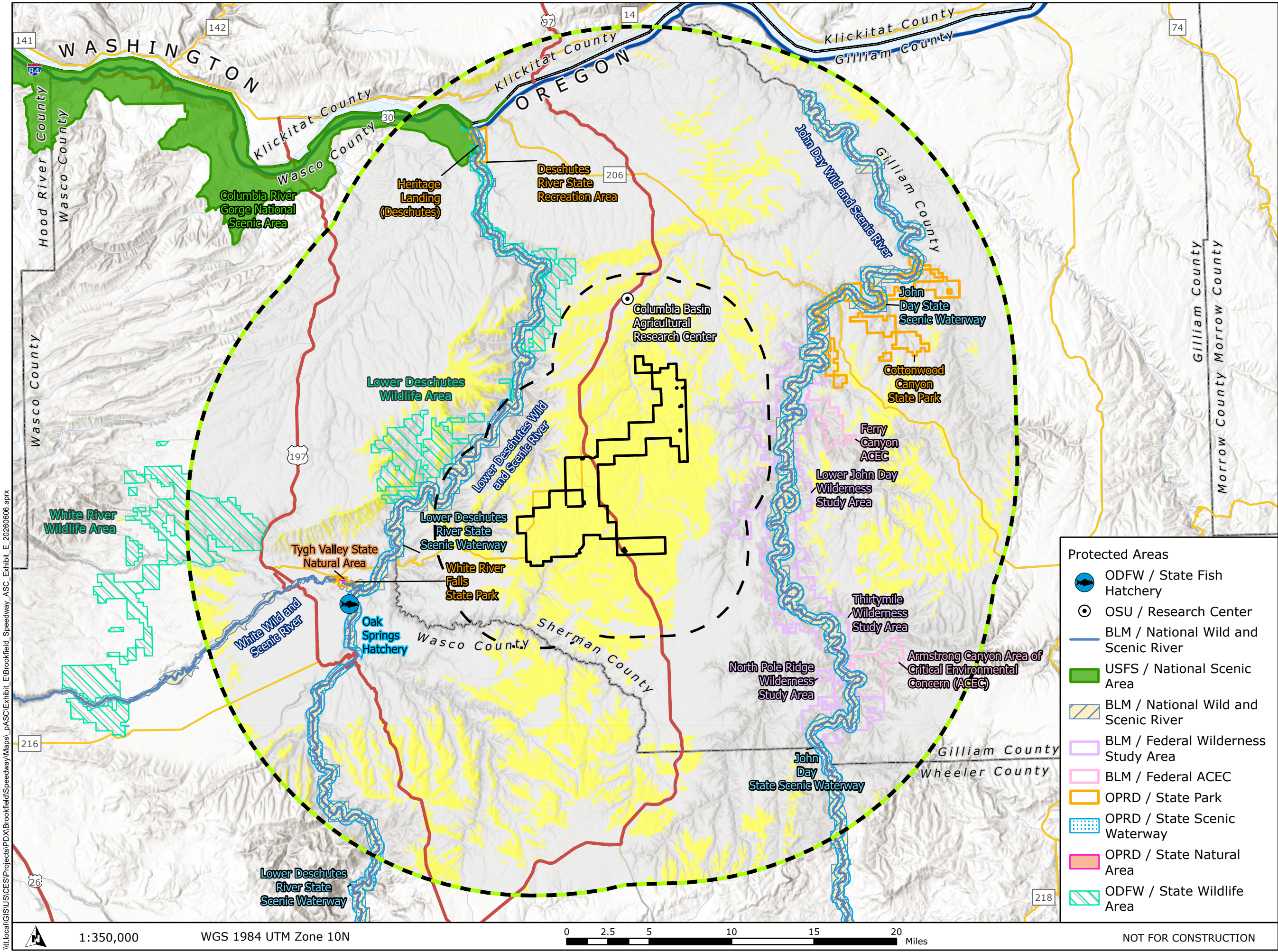
- 1 - 15 (Minimal)
- 16 - 30 (Low)
- 31 - 44 (Moderate)

* Potential turbine visibility calculated using a 30 meter bare-earth digital elevation model with turbine heights of 767.8 feet (234 meters) representing 110% Maximum Blade Tip Height and a viewing height of 5.75 feet (1.75 meters).

TETRA TECH **Speedway Energy**



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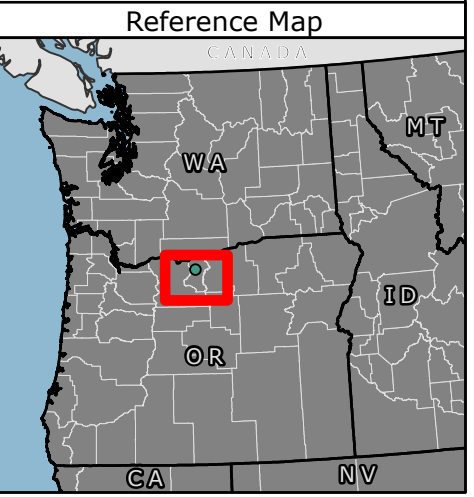
Speedway Energy Facility

Figure E-2.2
Protected Areas
Solar Array Viewshed

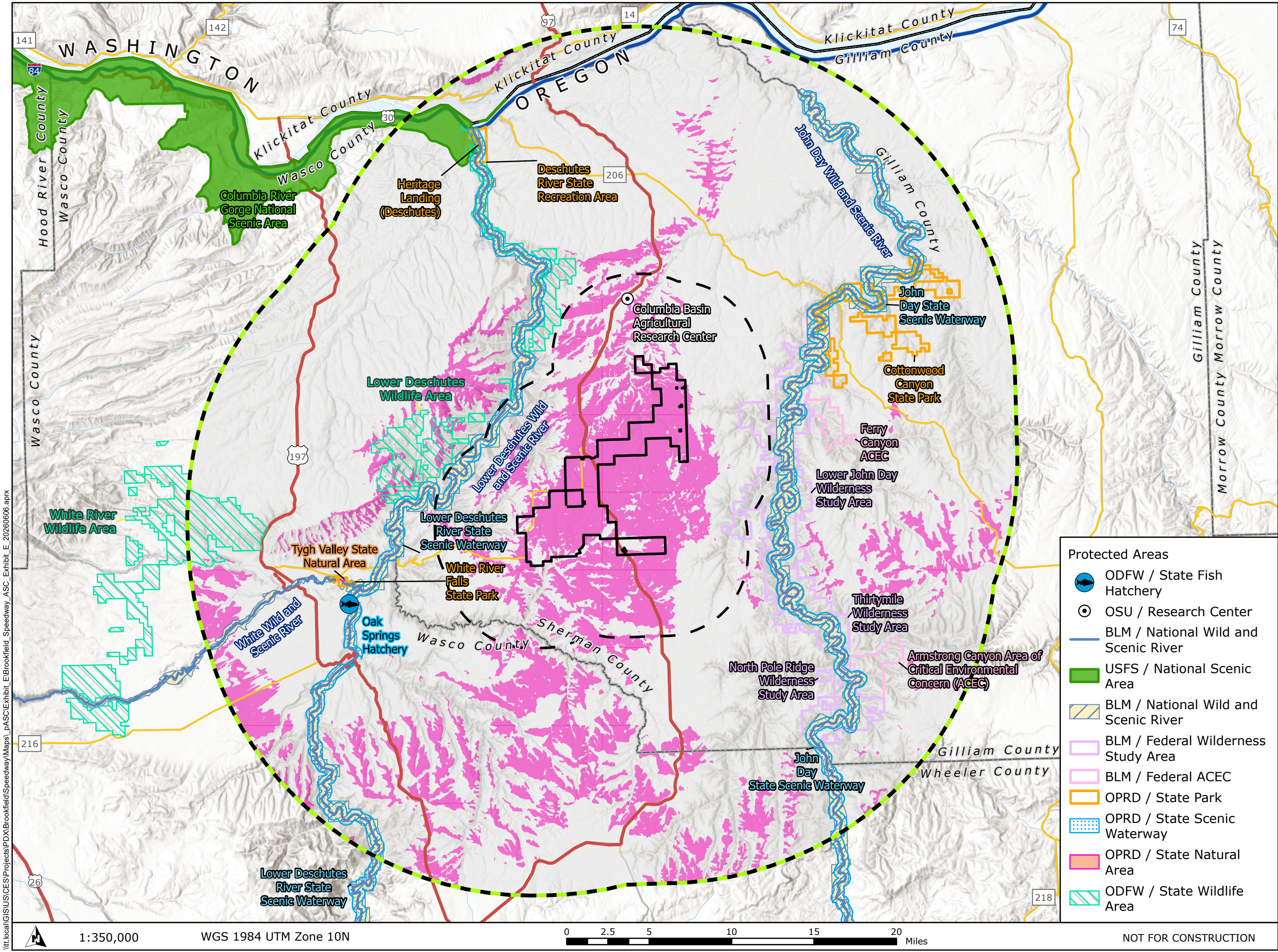
SHERMAN COUNTY, OR

- Site Boundary
- Study Area (20-mile Buffer)
- 5-miles
- State Boundary
- County Boundary
- Interstate Highway
- US Highway
- State Highway
- Solar Array Visibility*
- Not Visible
- Potentially Visible

* Potential solar array visibility calculated using a 30 meter bare-earth digital elevation model with solar array heights of 12 feet (4 meters) and a viewing height of 5.75 feet (1.75 meters).



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Speedway Energy Facility

Figure E-2.3
Protected Areas
Collection Line
Viewshed

SHERMAN COUNTY, OR

Site Boundary

Study Area (20-mile Buffer)

5-miles

State Boundary

County Boundary

Interstate Highway

US Highway

State Highway

Collection Line Visibility*

Not Visible

Potentially Visible

Protected Areas

- ODFW / State Fish Hatchery
- OSU / Research Center
- BLM / National Wild and Scenic River
- USFS / National Scenic Area
- BLM / National Wild and Scenic River
- BLM / Federal Wilderness Study Area
- BLM / Federal ACEC
- OPRD / State Park
- OPRD / State Scenic Waterway
- OPRD / State Natural Area
- ODFW / State Wildlife Area

* Potential collection line visibility calculated using a 30 meter bare-earth digital elevation model with collection line heights of 135 feet (41 meters) and a viewing height of 5.75 feet (1.75 meters).

TETRA TECH

Speedway Energy

Reference Map

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Attachment E-1. Protected Areas Inventory, Visual and Noise Assessment Results

Attachment E-1. Protected Areas Inventory, Visual and Noise Assessment Results

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
National Parks OAR 345-001-0010(26)(a)	N/A	None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
National Monuments OAR 345-001-0010(26)(b)	N/A	None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Wilderness Areas OAR 345-001-0010(26)(c)	N/A	None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
National Wild, Scenic, or Recreational Rivers OAR 345-001-0010(26)(d)	Bureau of Land Management (BLM), Prineville District 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	White Wild and Scenic River	9.8	10.1	9.9	12.0	W	Yes (31-44 [moderate])	Yes	Yes	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to moderate depending on location in the White Wild and Scenic River; however, at a far background viewing distance of 10.1 miles or greater, the turbines will be barely perceptible in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The viewshed analysis also indicates limited potential visibility of the solar array from the western portion of the River at a background viewing distance of 9.9 miles or greater. Additionally, the aboveground collector line may be visible in the far background of the River (12.0 miles); however, if visible, the additional visual contrast within an existing modified landscape, as noted above, will be weak. Potential views of the Facility will be limited to White River Canyon rims and walls which are inaccessible to the public. No management direction applicable to preservation of scenic qualities outside of the River. The Facility will not compromise the purpose of the River.	No audible noise

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
		Lower Deschutes Wild and Scenic River	3.7	4.4	3.7	5.1	NW	Yes (31-44 [moderate])	Yes	No	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to moderate depending on location in the Lower Deschutes Wild and Scenic River; however, at a middleground viewing distance of 4.4 miles or greater, the turbines will not create a prominent feature in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The viewshed analysis also indicates potential visibility of the solar array from scattered portions of the River at a middleground viewing distance of 3.7 miles or greater; however, if visible, the additional visual contrast within an existing modified landscape, as noted above, will be weak. The aboveground collector line is not visible from the River and therefore will not contribute to visual contrast from this location. Potential views of the Facility will be limited to Lower Deschutes River Canyon rims and walls which are inaccessible to the public. No management direction applicable to preservation of scenic qualities outside of the River. The Facility will not compromise the purpose of the River.	No audible noise
		John Day Wild and Scenic River	5.2	6.2	5.2	7.0	E	Yes (1-15 [minimal])	No	No	Negligible impact. Viewshed analysis indicates minimal potential turbine visibility depending on location in the John Day Wild and Scenic River; however, at a background viewing distance of 6.2 miles or greater, the turbines will not create a prominent feature in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The solar array and aboveground collector line are not visible from the River and therefore will not contribute to visual contrast from this location. Potential views of the Facility will be limited to John Day River Canyon rims and walls which are inaccessible to the public. No management direction applicable to preservation of scenic qualities outside of the River. The Facility will not compromise the purpose of the River.	No audible noise

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
National Wildlife Refuges OAR 345-001-0010(26)(e)	N/A	None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
National Fish Hatcheries OAR 345-001-0010(26)(f)	N/A	None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
National Recreation Areas, Scenic Areas, or Special Resources Management Areas OAR 345-001-0010(26)(g)	Columbia River Gorge National Scenic Area Supervisor's Office 902 Wasco Street Suite 200 Hood River, OR 97031 (541) 308-1700 No email listed	Columbia River Gorge National Scenic Area	15.5	19.2	15.5	18.0	NW	No	No	No	No impact. Viewshed analysis indicates no visibility of the turbines, solar array, or aboveground collector line at the Columbia River Gorge National Scenic Area within the analysis area. No management direction applicable to preservation of scenic qualities outside of the Scenic Area. The Facility will not compromise the purpose of the Scenic Area.	No audible noise
Wilderness Study Areas OAR 345-001-0010(26)(h)	BLM, Prineville District 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Lower John Day Wilderness Study Area (WSA)	3.2	4.0	3.2	4.7	E	Yes (31-44 [moderate])	Yes	Yes	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to moderate depending on location in the Lower John Day WSA; however, at a middleground viewing distance of 4.0 miles or greater, the turbines will not create a prominent feature in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The viewshed analysis also indicates limited potential visibility of the solar array from scattered portions of the WSA at a middleground viewing distance of 3.2 miles or greater. Additionally, the aboveground collector line may be visible in the middleground of the WSA (4.7 miles); however, if visible, the additional visual contrast within an existing modified landscape, as noted above, will be weak. No management direction applicable to preservation of scenic qualities outside of the WSA. The Facility will not compromise the purpose of the WSA.	No audible noise

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
		North Pole Ridge WSA	11.7	15.9	11.7	16.9	SE	Yes (31-44 [moderate])	No	No	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to moderate depending on location in the North Pole Ridge WSA; however, at a far background viewing distance of 15.9 miles or greater, the turbines will be barely perceptible in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The solar array and aboveground collector line are not visible from the WSA and therefore will not contribute to visual contrast from this location. No management direction applicable to preservation of scenic qualities outside of the WSA. The Facility will not compromise the purpose of the WSA.	No audible noise
		Thirtymile WSA	6.5	10.9	6.5	11.2	E	Yes (31-44 [moderate])	Yes	Yes	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to moderate depending on location in the Thirtymile WSA; however, at a far background viewing distance of 10.9 miles or greater, the turbines will be barely perceptible in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The viewshed analysis also indicates potential visibility of the solar array from limited portions of the WSA at a background viewing distance of 6.5 miles or greater. Additionally, the aboveground collector line may be visible in the far background of the WSA (11.2 miles); however, if visible, the additional visual contrast within an existing modified landscape, as noted above, will be weak. No management direction applicable to preservation of scenic qualities outside of the WSA. The Facility will not compromise the purpose of the WSA.	No audible noise

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
Federally Land Management Plan Designated Lands OAR 345-001-0010(26)(i)	BLM, Prineville District 3050 NE 3rd Street Prineville, OR 97754 (541) 416-6700 BLM_OR_PR_Mail@blm.gov	Armstrong Canyon Area of Critical Environmental Concern (ACEC)	12.8	17.0	12.8	17.7	SE	Yes (31-44 [moderate])	No	No	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to moderate depending on location in the Armstrong Canyon ACEC; however, at a far background viewing distance of 17.0 miles or greater, the turbines will be barely perceptible in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The solar array and aboveground collector line are not visible from the ACEC and therefore will not contribute to visual contrast from this location. No management direction applicable to preservation of scenic qualities outside of the ACEC. The Facility will not compromise the purpose of the ACEC.	No audible noise
		Ferry Canyon ACEC	7.3	8.1	7.3	8.7	E	Yes (16-30 [low])	Yes	No	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to low depending on location in the Ferry Canyon ACEC; however, at a background viewing distance of 8.1 miles or greater, the turbines will not create a prominent feature in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The viewshed analysis also indicates potential visibility of the solar array from limited portions of the ACEC at a background viewing distance of 7.3 miles or greater; however, if visible, the additional visual contrast within an existing modified landscape, as noted above, will be weak. The aboveground collector line is not visible from the ACEC and therefore will not contribute to visual contrast from this location. No management direction applicable to preservation of scenic qualities outside of the ACEC. The Facility will not compromise the purpose of the ACEC.	No audible noise
State Parks, Waysides, Corridors, Monuments, Historic, or Recreation Areas	Oregon Parks and Recreation Department (OPRD) 725 Summer Street NE, Suite C Salem, OR 97301	Deschutes River State Recreation Area	7.0	8.7	7.1	8.8	NW	No	No	No	No impact. Viewshed analysis indicates no visibility of the turbines, solar array, or aboveground collector line at the Deschutes River State Recreation Area within the analysis area. No management direction applicable to preservation of scenic qualities outside of the Recreation Area. The Facility will not compromise the purpose of the Recreation Area.	No audible noise

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
OAR 345-001-0010(26)(j)	(541) 739-2322 park.info@oregon.gov	Heritage Landing (Deschutes)	16.0	19.9	16.0	18.4	NW	No	No	No	No impact. Viewshed analysis indicates no visibility of the turbines, solar array, or aboveground collector line at the Heritage Landing (Deschutes) within the analysis area. No management direction applicable to preservation of scenic qualities outside of the Landing. The Facility will not compromise the purpose of the Landing.	No audible noise
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 394-0002 park.info@oregon.gov	Cottonwood Canyon State Park	8.5	9.7	8.5	10.0	NE	Yes (16-30 [low])	No	No	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to low depending on location in the Cottonwood Canyon State Park; however, at a background viewing distance of 9.7 miles or greater, the turbines will not create a prominent feature in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The solar array and aboveground collector line are not visible from the Park and therefore will not contribute to visual contrast from this location. No management direction applicable to preservation of scenic qualities outside of the Park. The Facility will not compromise the purpose of the Park.	No audible noise
	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (541) 739-2322 park.info@oregon.gov	White River Falls State Park	10.3	10.6	10.4	12.5	W	No	No	No	No impact. Viewshed analysis indicates no visibility of the turbines, solar array, or aboveground collector line at the White River Falls State Park within the analysis area. No management direction applicable to preservation of scenic qualities outside of the Park. The Facility will not compromise the purpose of the Park.	No audible noise
Willamette River Greenway OAR 345-001-0010(26)(k)	N/A	None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oregon Register of Natural Areas Designated Natural Areas OAR 345-001-0010(26)(l)	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0707 park.info@oregon.gov	Tygh Valley State Natural Area	10.7	11.0	10.8	12.9	W	No	No	No	No impact. Viewshed analysis indicates no visibility of the turbines, solar array, or aboveground collector line at the Tygh Valley State Natural Area within the analysis area. No management direction applicable to preservation of scenic qualities outside of the Natural Area. The Facility will not compromise the purpose of the Natural Area.	No audible noise

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
South Slough National Estuarine Research Reserve OAR 345-001-0010(26)(m)	N/A	None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
State Scenic Waterways OAR 345-001-0010(26)(n)	OPRD 725 Summer Street NE, Suite C Salem, OR 97301 (503) 986-0707 park.info@oregon.gov	Lower Deschutes State Scenic Waterway	3.7	4.5	3.7	5.3	NW	Yes (31-44 [moderate])	Yes	No	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to moderate depending on location in the Lower Deschutes State Scenic Waterway; however, at a middleground viewing distance of 4.5 miles or greater, the turbines will not create a prominent feature in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The viewshed analysis also indicates potential visibility of the solar array from scattered portions of the Waterway at a middleground viewing distance of 3.7 miles or greater; however, if visible, the additional visual contrast within an existing modified landscape, as noted above, will be weak. The aboveground collector line is not visible from the Waterway and therefore will not contribute to visual contrast from this location. Potential views of the Facility will be limited to Lower Deschutes River Canyon rims and walls which are inaccessible to the public. No management direction applicable to preservation of scenic qualities outside of the Waterway. The Facility will not compromise the purpose of the Waterway.	No audible noise

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
		John Day State Scenic Waterway	5.2	6.2	5.3	7.0	E	Yes (1-15 [minimal])	No	No	Negligible impact. Viewshed analysis indicates minimal potential turbine visibility depending on location in the John Day State Scenic Waterway; however, at a background viewing distance of 6.2 miles or greater, the turbines will not create a prominent feature in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The solar array and aboveground collector line are not visible from the Waterway and therefore will not contribute to visual contrast from this location. Potential views of the Facility will be limited to John Day River Canyon rims and walls which are inaccessible to the public. No management direction applicable to preservation of scenic qualities outside of the Waterway. The Facility will not compromise the purpose of the Waterway.	No audible noise
State Wildlife Areas and Management Areas OAR 345-001-0010(26)(o)	Oregon Department of Fish and Wildlife (ODFW) Lower Deschutes Wildlife Area 78430 Dodson Road Tygh Valley, OR 97063 (541) 296-4628 odfw.info@odfw.oregon.gov	Lower Deschutes Wildlife Area	4.8	5.9	4.8	6.1	NW	Yes (31-44 [moderate])	Yes	Yes	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to moderate depending on location in the Lower Deschutes Wildlife Area; however, at a background viewing distance of 5.9 miles or greater, the turbines will not create a prominent feature in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The viewshed analysis also indicates potential visibility of the solar array from scattered portions of the Wildlife Area at a middleground viewing distance of 4.8 miles or greater. Additionally, the aboveground collector line may be visible in the background of the Wildlife Area (6.1 miles); however, if visible, the additional visual contrast within an existing modified landscape, as noted above, will be weak. No management direction applicable to preservation of scenic qualities outside of the Wildlife Area. The Facility will not compromise the purpose of the Wildlife Area.	No audible noise

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
	ODFW White River Wildlife Area 78430 Dodson Road Tygh Valley, OR 97063 (541) 544-2126 odfw.info@odfw.oregon.gov	White River Wildlife Area	15.2	15.5	15.2	17.4	W	Yes (16-30 [low])	Yes	Yes	Negligible impact. Viewshed analysis indicates potential turbine visibility ranging from minimal to low depending on location in the White River Wildlife Area; however, at a far background viewing distance of 15.5 miles or greater (i.e., the seldom seen distance zone), the turbines will be barely perceptible in the viewshed. If any turbines were visible, the additional visual contrast within an existing modified landscape that includes utility infrastructure, rural development, and agricultural irrigation equipment will be weak. The viewshed analysis also indicates potential visibility of the solar array from limited portions of the Wildlife Area at a far background viewing distance of 15.2 miles or greater. Additionally, the aboveground collector line may be visible in the far background of the Wildlife Area (17.4 miles); however, if visible, the additional visual contrast within an existing modified landscape, as noted above, will be weak. No management direction applicable to preservation of scenic qualities outside of the Wildlife Area. The Facility will not compromise the purpose of the Wildlife Area.	No audible noise
State Fish Hatcheries OAR 345-001-0010(26)(p)	ODFW Oak Springs Hatchery 85001 Oak Springs Road Maupin, OR 97037 (541) 395-2546 odfw.info@odfw.oregon.gov	Oak Springs Hatchery	11.0	11.4	11.3	13.3	SW	No	No	No	No impact. Viewshed analysis indicates no visibility of the turbines, solar array, or aboveground collector line at the Oak Springs Hatchery within the analysis area. No management direction applicable to preservation of scenic qualities outside of the Hatchery. The Facility will not compromise the purpose of the Hatchery.	No audible noise
Oregon State University (OSU) Designated Agricultural Experiment Stations, Experimental Areas, or Research Centers OAR 345-001-0010(26)(q)	Oregon State University (OSU), Sherman Station 66365 Lone Rock Road Moro, OR 97039 (541) 565-3522 No email listed	Columbia Basin Agricultural Research Center (Moro Unit)	3.5	7.9	3.5	5.8	N	No	No	No	No impact. Viewshed analysis indicates no visibility of the turbines, solar array, or aboveground collector line at the Columbia Basin Agricultural Research Center (Moro Unit) within the analysis area. No management direction applicable to preservation of scenic qualities outside of the Center. The Facility will not compromise the purpose of the Center.	No audible noise

Protected Areas within 20 Miles of Site Boundary			Distance to Facility Component (miles)				Direction from Project	Facility Potentially Visible?			Visual Analysis Results	Operational Noise Analysis Results
Type	Contact Information	Area Name	Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Turbines (maximum number of wind turbines visible [turbine visibility ranking])	Solar Array	Aboveground Collector Line		
OSU Designated Research Forests OAR 345-001- 0010(26)(r)	N/A	None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A