

Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit K. Recreation

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



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Table of Contents

1.0	Introduction.....	1
2.0	Analysis Area.....	1
3.0	Recreational Opportunities Inventory – OAR 345-022-0100(4)(a)(e).....	1
3.1	Inventory Methods.....	1
3.2	Resource Descriptions.....	2
3.2.1	Private.....	2
3.2.2	Non-Governmental Organizations	3
3.2.3	Local.....	3
3.2.4	State	3
3.2.5	Tribal	4
3.2.6	Federal.....	4
3.3	Importance Assessment.....	4
4.0	Potential Impacts – OAR 345-022-0100(4)(b)(c).....	6
4.1	Loss of Opportunity.....	6
4.2	Noise Impacts.....	7
4.3	Traffic Impacts.....	8
4.4	Visual Impacts.....	10
4.4.1	Visual Impact Assessment Methodology	10
4.4.2	Visual Impact Assessment Results.....	12
4.5	Summary of Impacts	17
5.0	Avoidance and Mitigation – OAR 345-022-0100(4)(d)	21
6.0	Monitoring Program – OAR 345-022-0100(4)(f).....	21
7.0	References	21
8.0	Approval Standards and Submittal Requirements.....	24

List of Tables

Table K-1. Summary of Impacts to Important Recreational Opportunities.....	19
Table K-2. Approval Standards and Submittal Requirements Matrix	24

List of Figures

Figure K-1. Recreational Opportunities within the Analysis Area
Figure K-2.1. Recreational Opportunities Turbine Viewshed
Figure K-2.2. Recreational Opportunities Solar Array Viewshed
Figure K-2.3. Recreational Opportunities Collection Line Viewshed

List of Attachments

Attachment K-1. Inventory of Recreational Opportunities in the Analysis Area

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
Applicant	BGTF Speedway Project LLC
BESS	battery energy storage system
BLM	Bureau of Land Management
BPA	Bonneville Power Administration
dba	A-weighted decibels
Facility	Speedway Energy Facility
gen-tie	generation-tie
kV	kilovolt
LLC	limited liability company
MBTH	maximum blade tip height
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODOT	Oregon Department of Transportation
ODFW	Oregon Department of Fish and Wildlife
OPRD	Oregon Parks and Recreation Department
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 (POI) 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.

Exhibit K presents information supporting demonstration of compliance with the Recreation approval standard and submittal requirements in Oregon Administrative Rules (OAR) 345-022-0100.

2.0 Analysis Area

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

3.0 Recreational Opportunities Inventory – OAR 345-022-0100(4)(a)(e)

(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 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(2) as a basis for identifying important recreational opportunities;

[...]

(e) A map of the analysis area showing the locations of important recreational opportunities identified in subsection (a); and

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; BLM 2026a, BLM 2026b), U.S. Forest Service (USFS 2026a, USFS 2026b), U.S. Geological Survey (USGS 2024), Oregon Department of Fish and Wildlife (ODFW; ODFW 2021a), and Oregon Parks and Recreation Department (OPRD; OPRD 2024);
- Land management agency planning documents (NPS 1999);
- Comprehensive plans, park and recreation plans, and individual park master plans prepared by OPRD and by counties and municipal governments within the analysis area (Sherman County 2007, Wasco County 2022);
- Internet sites maintained by recreation provider agencies, including OPRD, ODFW, Oregon Department of Transportation (ODOT), and county and city park departments (City of Grass Valley 2023, City of Moro 2026, ODFW 2026a, ODOT 2019, OPRD 2026a, OPRD 2026b, OPRD 2026c, Sherman County 2026a, Wasco County 2026); 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 (Google Earth 2024).

3.2 Resource Descriptions

In general, recreation activities in the analysis area may consist of camping (including RV options), fishing, swimming and various water activities, hiking, biking, sightseeing, horseback riding, hunting, and vehicle racing. 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(2).

There are nine identified recreational opportunities within the analysis area (Attachment K-1, Figure K-1).¹ These are the Sherman County RV Park/Fairgrounds, Moro City Park, Grass Valley City Park/RV Park, Oregon Raceway Park, Lower Deschutes Wildlife Area, Journey Through Time Scenic Byway (US-97), Lower Deschutes River Canyon, Lower John Day Wilderness Study Area (WSA), and the Lower Deschutes River Back Country Byway. Recreational opportunities within the analysis area are described below in order of private, non-governmental, local, state, tribal, and federal ownership/management.

3.2.1 Private

The Pacific Motorsports Management LLC manages the Oregon Raceway Park within the analysis area. Although the offerings of the Oregon Raceway Park are considered to be rare for the area (i.e.,

¹ Note that although the Oregon National Historic Trail (ONHT) alignment crosses the site boundary (i.e., the Barlow Cutoff Road/Trail), no high-potential sites or segments are within the 5-mile analysis area. These are the only sites/segments along the ONHT alignment that are intact *and* publicly accessible and not located on private property that warrant inclusion in this Exhibit. The closest high-potential site/segment— the Tygh Valley high-potential site— is located 15.2 miles southwest of the analysis area (NPS 1999).

vehicle racing), it is not locationally dependent and considered to have relatively low to moderate demand due to the location (Oregon Raceway Park 2026). Therefore, due to the lack of demand and replaceability, the Oregon Raceway Park is not considered to be an important recreational resource.

3.2.2 Non-Governmental Organizations

No non-governmental organization-owned recreational opportunities were identified within the analysis area.

3.2.3 Local

Sherman County and the cities of Moro and Grass Valley provide recreational opportunities within the analysis area. Sherman County manages the Sherman County RV Park/Fairgrounds. Due to being the sole county fairgrounds, and thus likely having moderate demand, unique and outstanding qualities, and rareness, the Sherman County RV Park/Fairgrounds is considered an important recreational resource.

The City of Moro manages the sole city park, Moro City Park. The Park offers typical neighborhood park amenities (with some historic-centric attractions) and is considered to have low demand due to its location (City of Moro 2026). Therefore, due to the lack of demand, outstanding qualities, and replaceability, the Moro City Park is not considered to be an important recreational resource.

Lastly, the City of Grass Valley manages the Grass Valley City Park/RV Park. The Grass Valley City Park/RV Park offers typical neighborhood park amenities and is considered to have low demand due to its location (Sherman County 2026a). Therefore, due to the lack of demand, outstanding qualities, and replaceability, the Grass Valley City Park/RV Park is not considered to be an important recreational resource.

3.2.4 State

There is a single parcel owned by the Oregon Department of State Lands within the analysis area (see Figure K-1). This parcel does not contain a designated recreation area nor is it considered a recreational resource.

The OPRD manages the Lower Deschutes State Scenic Waterway (discussed below as part of the Lower Deschutes River and evaluated as a protected area in Exhibit E) within the analysis area. Due to its demand, outstanding qualities, rareness (primarily related to river recreation), and irreplaceability, the Lower Deschutes River Canyon is considered an important recreational resource.

ODFW manages the Lower Deschutes Wildlife Area within the analysis area (evaluated as a protected area in Exhibit E). The site is accessible to hikers, bikers, and boaters and cannot be accessed by car, therefore offering a more secluded experience to recreate. The most popular recreational opportunities at the site are angle fishing, hunting, and wildflower viewing (ODFW

2026b). Due to these outstanding qualities, and the high demand, rareness, and irreplaceability, the wildlife area is considered an important recreational resource.

Lastly, ODOT manages the state highway rights-of-way and associated State Scenic Byways. A portion of the Journey Through Time Scenic Byway is located within the analysis area (ODOT 2019). Due to its demand, outstanding qualities, and irreplaceability, the Journey Through Time Scenic Byway is considered an important recreational resource. Similarly, a portion of the state-managed Oregon Route 216 (OR-216) is within the analysis area, which does not include any associated recreational opportunities (note that a portion of OR-216 is considered to be a scenic resource; see Exhibit I for the relevant assessment).

3.2.5 Tribal

No Tribal-owned recreational opportunities were identified within the analysis area.

3.2.6 Federal

The BLM Prineville District manages several parcels within the analysis area (see Figure K-1) which encompass the following recreation areas: the Lower Deschutes River Canyon (i.e., the Lower Deschutes Wild and Scenic River and Lower Deschutes State Scenic Waterway [both evaluated as protected areas in Exhibit E]; including the associated campgrounds Jones Canyon, Beavertail, Rattlesnake Canyon, and Mack's Canyon), the Lower John Day WSA (evaluated as a protected area in Exhibit E), and the Lower Deschutes River Back Country Byway (see Figure K-1 and Attachment K-1). Due to their demand (ranging from low to high), outstanding qualities, rareness (primarily related to river recreation or riparian wildlife habitat), and irreplaceability, they are all considered to be important recreational resources.

3.3 Importance Assessment

Recreational opportunities identified within the analysis area were evaluated for “importance” based on the criteria outlined in OAR 345-022-0100. A recreational opportunity may be 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. Specific considerations used to characterize the importance of a recreational opportunity relative to the five criteria outlined in OAR 345-022-0100 are summarized as follows:

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

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

There are distinct, identifiable differences among the types of special management designations that apply to lands within the analysis area, and their associated implications for resource protection. Wilderness designation, for example, results in management direction to preserve the resource values of the designated area, and represents a high level of protection. Other types of designations allow much more latitude in undertaking management activities, and involve a lower

degree of resource protection. The source of the special designation is also a relevant consideration; a designation established through an act of Congress clearly carries more weight than an administrative designation applied by a resource management agency.

(b) The degree of demand;

Qualitative ratings of High, Moderate, and Low were used as proxy measures for the level of demand for a specific recreational opportunity.

(c) Any outstanding or unusual qualities;

Identification of characteristics that might be considered outstanding or unusual for a given opportunity is a highly subjective task, as there is a wide variation in the values, tastes, and perceptions among the recreational public. The standard does not specify what qualities would define an opportunity as “outstanding” or “unusual,” or indicate how those characteristics could be measured. Some sites or areas have attributes that qualify them as “unique” (i.e., one of a kind), while others have qualities that are not unique, but intuitively set them apart from other opportunities and could be considered outstanding or unusual.

(d) The availability or rareness; and

Qualitative ratings of Rare, Uncommon, and Common were used to address the criterion based on the apparent rareness of an opportunity. Consideration of this rareness attribute was based on the approximate set of comparable opportunities (and the geographic scale appropriate to each type of opportunity) available within the region surrounding the Facility.

(e) The irreplaceability or irretrievability of the opportunity.

Ratings of Irreplaceable, Somewhat Irreplaceable, and Replaceable were used to address the criterion based on the ability to replace an opportunity. In general, opportunities based on inherent natural resource characteristics that could not feasibly be re-created in the same place or at another reasonably nearby location were considered Irreplaceable. By contrast, most opportunities that are based on constructed recreational facilities or infrastructure (such as typical campgrounds) could feasibly be replaced and were considered Replaceable.

The assessment of the overall importance for each identified recreational opportunity was conducted on a case-by-case basis. Section 3 provides a summary of each identified recreational opportunity in the analysis area, describes the characteristics of the opportunity relative to the importance criteria, and indicates which opportunities are considered important for the purposes of this Exhibit. A description of each recreational opportunity appears in the following section.

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

- Sherman County RV Park/Fairgrounds;
- Lower Deschutes Wildlife Area;
- Journey Through Time Scenic Byway (US-97);
- Lower Deschutes River Canyon;

- Lower John Day WSA; and
- Lower Deschutes River Back Country Byway.

4.0 Potential Impacts – OAR 345-022-0100(4)(b)(c)

(b) A description of any potential adverse impacts to the important opportunities identified in subsection (a) including, but not limited to:

(A) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation;

(B) Noise resulting from facility construction or operation;

(C) Increased traffic resulting from facility construction or operation; and

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

(c) An evaluation of the significance of the potential adverse impacts identified under subsection (b);

The potential effects to important recreational opportunities in the analysis area were studied to determine whether the Facility's design, construction, and operation, when taking into account mitigation, would be likely to result in any significant adverse impacts. The following sections summarize both the types of potential adverse impacts evaluated and the analysis.

4.1 Loss of Opportunity

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 would not directly impact any identified recreation resource, as five of the six important recreational resources are not within the site boundary. Similarly, although the Journey Through Time Scenic Byway crosses the site boundary (i.e., the 230-kV aboveground collection line, specifically), a portion of the Facility's 230-kV aboveground collection line would be constructed over the byway, and a portion of the 34.5-kV collection lines would be constructed under the byway; thus, once construction is complete, would not result in a permanent, direct loss of recreational use of the byway, which is currently crossed by existing transmission lines. Several transmission lines cross the byway within the analysis area, most notably, crossing portions of the byway that are immediately adjacent or within the site boundary (Google Earth 2024; see further discussion in Section 4.4.2.3). Additionally, the underground collection line would be installed using directional boring, avoiding any impact to the byway surface.

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.

With respect to the first type of potential indirect loss, because the five of the six identified important recreational resources in the analysis area are located farther than 3.2 miles from the site boundary, indirect opportunity loss due to temporary closure for safety concerns is unlikely to occur. Similarly, although the Journey Through Time Scenic Byway crosses the site boundary, the construction of the 230-kV aboveground collection line and underground collection line would only result in temporary impacts and would otherwise not result in a permanent, direct loss of recreational use of the byway once constructed; see description above. Note that construction of the Facility in general would occur across months to accommodate construction or weather delays. Potential sources of the second type of indirect loss—environmental disturbance impacts to important recreational opportunities—include noise, traffic, and changes in visual quality associated with the Facility; the following sections analyze these three factors.

4.2 Noise Impacts

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). All of the important recreation areas are within 4.8 miles of the site boundary, and are projected to receive up to 70 dBA, at the loudest, at the Journey Through Time Scenic Byway, i.e., the closest resource to the turbines, substations, and BESS; this sound level is approximately equivalent to less than that of a washing machine or loud conversation. The remaining important recreation areas would receive up to 30 dBA during construction, which is approximately equivalent to a whisper. Note that two of these important recreation areas would be considered noise sensitive properties, the Lower Deschutes Wild and Scenic River and Sherman County RV Park/Fairgrounds, due to overnight camping opportunities being present onsite. These important recreational resources 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. Five of the six important recreation areas are located further than 1.2 miles from the site boundary (i.e., the Sherman County RV Park/Fairgrounds, Lower Deschutes Wildlife Area, Lower Deschutes River Canyon, Lower John Day WSA, and Lower Deschutes River Back Country Byway), where noise from the Facility would be effectively indistinguishable from both daytime and nighttime projected background/ambient sound levels. The one remaining important recreation area, the Journey Through Time Scenic Byway is crossed by the site boundary (and approximately 0.4 miles to the nearest turbines, 0.02 miles to the solar array, and crossed by the aboveground collector line). Modeled worst-case operational noise level at the Journey Through Time Scenic Byway would be no more than 44 dBA; this sound level is approximately equivalent to a quiet library. The audible operations noise would not interfere with the primary purpose of this site, which is generally for sight-seeing. Table K-1 (in Section 4.5) provides a summary of operational noise levels from the Facility at important recreation areas within the analysis area.

4.3 Traffic Impacts

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 ODOT 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 important recreational opportunities are anticipated from Facility construction. All of the important recreational opportunities could have temporary traffic impacts during construction because they are accessed by roads that would also carry Facility construction traffic. The Sherman County RV Park/Fairgrounds, Lower Deschutes Wildlife Area (i.e., the northern portion), Journey Through Time Scenic Byway, and Lower John Day WSA can be accessed via US-97 (i.e., the segment from Moro to Kent, Oregon). 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, the primary route to

access this segment of the John Day River is via OR-206 (exits off US-97, travelling southeast), which is outside of the analysis area. Note that the Lower John Day WSA is only accessible by boat (BLM 2026c). Additionally, from the south (also outside of the analysis area), visitor traffic could also access resources along the John Day River by exiting immediately off US-97 to OR-293 and OR-218 (outside the analysis area) to travel east to the river, therefore avoiding Facility construction travel routes. Thus, the aforementioned important recreational opportunities are anticipated to experience access disruptions or delays 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 to last up to 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 important recreational opportunities are expected to be closed during construction or operation of the Facility.

Similarly, the Lower Deschutes Wildlife Area (i.e., the southern portion near Tygh Valley), Lower Deschutes River Canyon, and Lower Deschutes River Back Country Byway can be accessed via US-197 (i.e., outside of the analysis area) or OR-216 (i.e., the segment traveling west from US-97 to the Lower Deschutes River). 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 important recreational opportunities 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 (outside the analysis area). Thus, the aforementioned important recreational opportunities 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 important recreational opportunities.

Although there would be no significant traffic impacts, given the potential minor temporary impact of construction traffic on visitors to important recreational opportunities, the Applicant plans to employ best management practices as described in Exhibit L to ensure that access restrictions to any important recreation 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 important recreational opportunities are anticipated from construction of the Facility.

The operational phase of the Facility would affect important recreational opportunities 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 important recreational opportunities in the vicinity.

4.4 Visual Impacts

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 best management practices for dust control as detailed in Exhibit C and Exhibit O-2.

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 important recreational opportunity 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 and transmission 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 K-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 K-2.1), a maximum height of 12 feet for the solar arrays (Figure K-2.2); and a maximum height of 135 feet was assumed for the 230-kV aboveground collection line (Figure K-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 line 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 from five of the six important recreational opportunities in the analysis area (see Figure K-2 and Table K-1). The Lower Deschutes River Back Country Byway would not have Facility visibility.

Potential visibility is one of several factors that comprise an assessment of visual impact to an important recreational opportunity. 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 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 K-1 provides a summary of the visual impact assessment for each of the important recreational opportunities in the analysis area. Table K-2 also considers the visibility of the solar array and aboveground collection line for the Facility.

The proposed Facility turbines would potentially be visible from five of the six important recreational opportunities, the solar array would have potential visibility from four important recreational opportunities, and the aboveground collection line would have potential visibility from three important recreational opportunities. All of the important recreational opportunities

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 important recreational opportunities would be partially to fully screened by existing vegetation, terrain, and man-made structures.

The five important recreational opportunities with Facility visibility would have either foreground (i.e., Journey Through Time Scenic Byway) or middleground views (i.e., Sherman County RV Park/Fairgrounds, Lower Deschutes Wildlife Area, Lower Deschutes River Canyon, and Lower John Day WSA) of the Facility. The following paragraphs provide a more in-depth visual impact assessment for these important recreational opportunities.

4.4.2.1 Sherman County RV Park/Fairgrounds

At the Sherman County RV Park/Fairgrounds, the visual impact of the Facility is anticipated to be negligible. The viewshed analysis indicates up to a minimal number (1 to 15) of turbines would be visible depending on location at a background viewing distance of at least 7.6 miles (the proximity to the closest turbine) within the fairgrounds (Figure K-2.1). The turbines would appear as thin vertical structures with rotating blades that would be noticeable but appear small in scale. The turbines would create minimal visual contrast (i.e., minimally noticeable and not distinct), 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 solar arrays and aboveground collector line due to terrain/geographical screening (Figures K-2.2 and K-2.3). The Facility would not introduce a new or unusual feature or alter the existing visual character from Sherman County RV Park/Fairgrounds, as wind turbine structures are already present within the surrounding areas.

Despite the site's local importance, the Sherman County RV Park/Fairgrounds by itself is not identified or managed as an important scenic resource. As outlined in Attachment K-1, the fairgrounds hosts the annual County fair and rodeo and offers RV sites (Sherman County 2026a). During the annual County fair and rodeo, recreational events would predominately occur in the rodeo arena, with viewing offered via the grandstands; views from the grandstands towards the rodeo arena would be facing the opposite direction of the Facility. The RV park to the south is not anticipated to have as much visual sensitivity as during the annual rodeo/fair due to hosting less users and the temporary nature of the usage. Views from the RV park are also more focused on views of Mount Hood, which is facing west, i.e., not in the direction of the Facility (Sherman County 2026b). Therefore, although the fairgrounds would have some Facility visibility, the Facility is not anticipated to compromise the purpose of the fairgrounds and would not result in significant adverse visual impacts on this important recreation area.

4.4.2.2 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 K-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 K-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 K-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 2026b). The Wildlife Area itself is not managed for scenic quality (ODFW 2021b), 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 2026b). 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 important recreation area.

4.4.2.3 Journey Through Time Scenic Byway

At the Journey Through Time Scenic Byway, the visual impact of the Facility is anticipated to be moderate. The viewshed analysis indicates up to a moderate number (31 to 44) of turbines would be visible depending on location at a foreground viewing distance of at least 0.4 miles (the proximity to the closest turbine) along a majority of the byway within the analysis area (Figure K-2.1). The turbines would be prominent structures in the landscape, depending on terrain and vegetation. The turbines would extend well beyond the horizon and bring large-scale moving structures much closer to the viewer. Existing wind farms are present along the byway, namely near Moro and north to the intersection with I-84 (outside the analysis area) and are even highlighted as a notable feature along the byway (Travel Oregon 2026). The viewshed analysis also indicates potential intermittent visibility of the solar arrays at a foreground distance of 0.02 miles or greater along a majority of the byway within the analysis area (Figure K-2.2). Existing solar

farms are present along the byway, namely south of the Facility (just outside the analysis area). Because the solar arrays would appear relatively low to the ground with a maximum height of 12 feet, they would not be a prominent feature from this distance and would not obstruct or intrude upon views from the resource. Both the turbines and solar arrays would create weak visual contrast because they would be seen in context with existing landscape modifications, including existing renewable energy facilities, utility infrastructure, rural development, and agricultural irrigation equipment. Additionally, the Facility's associated aboveground collection line may also be visible at a foreground distance (byway crossed by aboveground collection line) along a majority of the byway within the analysis area (Figure K-2.3). The aboveground collection line would introduce thin vertical structures that would create low visual contrast in context with other existing similar electrical infrastructure in the viewshed; Several transmission lines cross the byway within the analysis area, most notably, crossing portions of the Byway that are immediately adjacent or within the site boundary (Google Earth 2024). Overall, visibility of Facility infrastructure would be increased due to flat topography. Note that the 7-mile portion of the byway that passes through the Facility site boundary would amount to about eight minutes of travel time (assuming a 55 miles-per-hour speed limit; ODOT 2026); therefore, visual impacts from the Facility infrastructure would be transient in nature, experienced by drivers as they pass through the Facility area. Although new structures would be constructed, the Facility would not introduce a new or unusual feature to the view or significantly alter the existing visual character.

There is no management direction for preservation of views or scenic quality related to the lands on which the Facility is located, outside the boundaries of the byway. The byway is identified by the applicable state management plans as well as by local plans as an important scenic resource where significant adverse visual impacts should be avoided (City of Grass Valley 2013, Michael Wetter & Associates 1996, ODOT 2023, Sherman County 2007, Wasco County 2022, Wasco County 2025; see Exhibit I); Besides potential mountain views from the byway (i.e., Mt. Hood, Mt. Jefferson, and Mt. Adams), the Journey Through Time Scenic Byway has no specific scenic resources/viewpoints identified along the portion of the byway within the analysis area (Michael Wetter & Associates 1996).

This portion of the byway is anticipated to primarily be used as a travel route to access the more popular byway attractions such as the John Day Fossil Beds National Monument, John Day River (i.e., the portions of the byway that run directly adjacent to the river between Spray and Prairie City), and the Painted Hills, all of which are located well outside the analysis area. Additionally, usage of the byway significantly drops after the OR-206 intersection per ODOT's 2024 Annual Average Daily Traffic data for US-97 (ODOT 2024). The portion of the byway within the analysis area offers panoramic, extended views due to the flat topography; however, these views are already dominated by either agricultural or energy/utility land uses. Therefore, with the implementation of design measures as applicable (as outlined in Exhibit I), views of the Facility would not compromise the purpose of the byway and the Facility would not have a significant adverse visual impact on this important recreation area.

4.4.2.4 Lower Deschutes River Canyon

The Lower Deschutes River Canyon encompasses both the Lower Deschutes Wild and Scenic River and Lower Deschutes State Scenic Waterway. At the Lower Deschutes River Canyon, 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 K-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 K-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 K-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 River Canyon is 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 below) parallel the river within the canyon (BLM 2026d). Although the River would have some intermittent Facility visibility, the Facility is not anticipated to compromise the purpose of the River and would not result in significant adverse visual impacts on this important recreation area.

4.4.2.5 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 K-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 K-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 K-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 2026c; see Exhibit E). 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 (both of which are outside the analysis area), thus public visitation and sight-seeing recreation opportunities are anticipated to be limited (BLM 2026c). 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 important recreation area.

4.5 Summary of Impacts

The Facility has been designed to avoid direct loss to all important and identified recreational opportunities (see Table K-1), and indirect disturbance effects would not lead to an indirect loss of any important or identified recreational opportunity. The six important recreational opportunities would receive some Facility construction noise, may experience some traffic impacts, and five of the six would have some visibility of the Facility at foreground or middleground viewing distances. Five of the six important recreational opportunities would not receive Facility operational noise beyond what is heard as background noise. The remaining important recreation area, the Journey Through Time Scenic Byway, would receive minimal operation noise equivalent to that of a quiet library; otherwise, operational noise would not exceed ambient/background noise levels. All six important recreational opportunities have the potential to experience some minor traffic impacts during construction. Traffic impacts for the important recreational opportunities would be limited to potential delays accessing these resources rather than traffic at the sites; any potential traffic

impacts would be temporary and intermittent during construction, and unlikely to affect the level of use at these sites.

Due to the middleground distance and existing landscape modifications present at four of the important recreational opportunities with Facility visibility, the Facility's turbines would create minimal visible contrast from these important recreational opportunities. From the single recreational opportunity with foreground views, the Journey Through Time Scenic Byway, views of the Facility would be moderate due to the flat topography but would be temporary and transient in nature. Public usage is likely reduced as compared to other portions of the Byway outside of the analysis area due to the lack of specific scenic resources/viewpoints. Additionally, existing wind and solar farms as well as transmission lines are present along the Byway, both within and outside the analysis area. Views of the turbines, solar array, and aboveground collection line would not interfere with the purpose or management direction of these recreational opportunities. Views of the Facility are considered unlikely to significantly affect visitor experience or numbers of visitors at these resources.

Table K-1. 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
Sherman County RV Park/Fairgrounds	No	No audible noise	Negligible to minor; potential short-term, intermittent access delays during construction, which would not create a significant adverse impact	Viewshed analysis indicates up to minimal turbine visibility (1 to 15 turbines) depending on location, at a background distance (7.6 miles); no solar array or aboveground collection line visibility from this resource; primary views at the Fairgrounds face away from the Facility; relatively temporary impacts (site of annual event); no conflict with management direction.
Lower Deschutes Wildlife Area	No	No audible noise	Negligible to minor; potential short-term, intermittent access delays during construction, which would not create a significant adverse impact	Viewshed analysis indicates up to moderate turbine visibility (31 to 44 turbines) depending on location, at a background distance (5.9 miles), solar array visibility from a middleground distance of 4.8 miles, and aboveground collection line visibility from a background distance of 6.1 miles; no conflict with management direction.
Journey Through Time Scenic Byway	No	<44 dBA; equivalent to a quiet library	Negligible to minor; potential short-term, intermittent access delays during construction, which would not create a significant adverse impact	Viewshed analysis indicates up to moderate turbine visibility (31 to 44 turbines) depending on location, at a foreground distance (0.4 miles), solar array visibility from a foreground distance of 0.02 miles, and aboveground collection line visibility from a foreground distance of 0 miles; existing energy and utility infrastructure present; likely reduced public usage compared to other portions of the byway; temporary/transient impacts; no conflict with management direction.
Lower Deschutes River Canyon	No	No audible noise	Negligible to minor; potential short-term, intermittent access delays during construction, which would not create a significant adverse impact	Viewshed analysis indicates up to moderate turbine visibility (31 to 44 turbines) depending on location, at a middleground distance (4.4 miles), solar array visibility from a middleground distance of 3.7 miles, and no aboveground collection line visibility; topography screens Facility from within the River canyon; no conflict with management direction.

Recreational Opportunity	Direct or Indirect Loss of Opportunity?	Operational Noise Analysis Results	Potential Traffic Impacts	Potential Visual Impacts
Lower John Day WSA	No	No audible noise	Negligible to minor; potential short-term, intermittent access delays during construction, which would not create a significant adverse impact	Viewshed analysis indicates up to moderate turbine visibility (31 to 44 turbines) depending on location, at a middleground distance (4.0 miles), solar array visibility from a middleground distance of 3.2 miles, and aboveground collection line visibility from a middleground distance of 4.7 miles; topography screens Facility from within the River canyon; accessible via water; no conflict with management direction.
Lower Deschutes River Back Country Byway	No	No audible noise	Negligible to minor; potential short-term, intermittent access delays during construction, which would not create a significant adverse impact	Viewshed analysis indicates no visibility of turbines, solar array or aboveground collection line.

5.0 Avoidance and Mitigation – OAR 345-022-0100(4)(d)

(d) A description of any measures the applicant proposes to avoid, reduce or otherwise mitigate any significant adverse impacts identified in subsection (b);

As described in Section 4, the Facility would 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 would 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 Program – OAR 345-022-0100(4)(f)

(f) The applicant's proposed monitoring program, if any, for impacts to important recreational opportunities.

Because construction and operation of the proposed Facility would 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.

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8.0 Approval Standards and Submittal Requirements

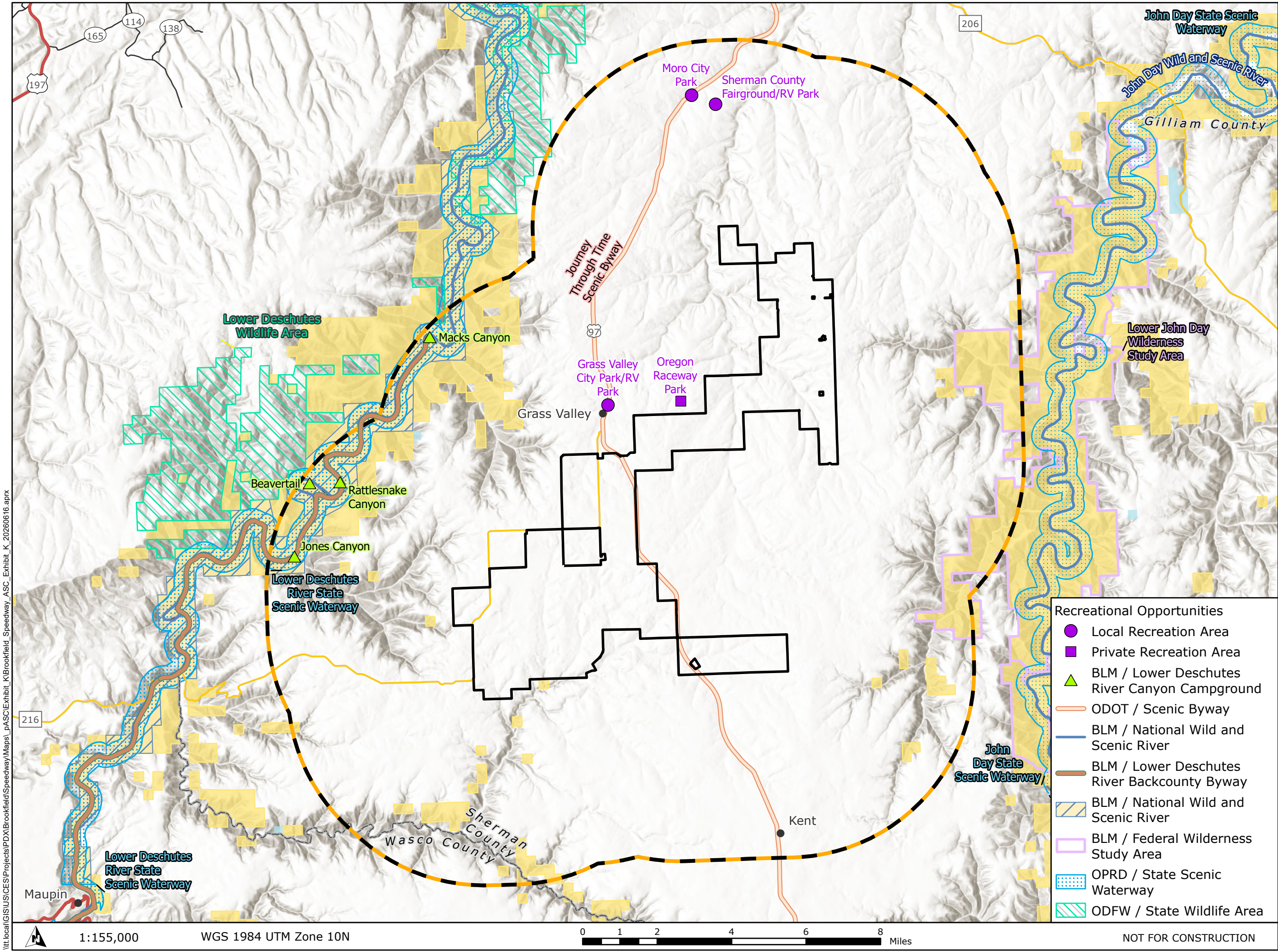
Table K-2. Approval Standards and Submittal Requirements Matrix

Requirements	Location
OAR 345-022-0100 Recreation	
Approval Standards	
(1) 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.	Sections 3.0 through 6.0
(2) The Council must consider the following factors in judging the importance of a recreational opportunity:	-
(a) Any special designation or management of the location;	Attachment K-1
(b) The degree of demand;	Attachment K-1
(c) Any outstanding or unusual qualities;	Attachment K-1
(d) The availability or rareness; and	Attachment K-1
(e) The irreplaceability or irretrievability of the opportunity.	Attachment K-1
(3) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). In issuing such a site certificate, the Council may impose conditions of approval to minimize the potential significant adverse impacts from the design, construction, and operation of the facility on important recreational opportunities.	N/A
Submittal Requirements	
(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 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(2) as a basis for identifying important recreational opportunities;	Section 3.0
(b) A description of any potential adverse impacts to the important opportunities identified in subsection (a) including, but not limited to:	Section 4.0
(A) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation;	Section 4.1
(B) Noise resulting from facility construction or operation;	Section 4.2
(C) Increased traffic resulting from facility construction or operation; and	Section 4.3
(D) Visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality.	Figures K-2.1, K-2.2, K-2.3, Section 4.4

Preliminary Application for Site Certificate
Exhibit K. Recreation

Requirements	Location
(c) An evaluation of the significance of the potential adverse impacts identified under subsection (b);	Sections 4.0 through 6.0
(d) A description of any measures the applicant proposes to avoid, reduce or otherwise mitigate any significant adverse impacts identified in subsection (b);	Section 5.0
(e) A map of the analysis area showing the locations of important recreational opportunities identified in subsection (a); and	Figure K-1
(f) The applicant's proposed monitoring program, if any, for impacts to important recreational opportunities.	Section 6.0
EFSC 5-2026, minor correction filed 05/15/2026, effective 05/15/2026	

Figures



Speedway Energy Facility

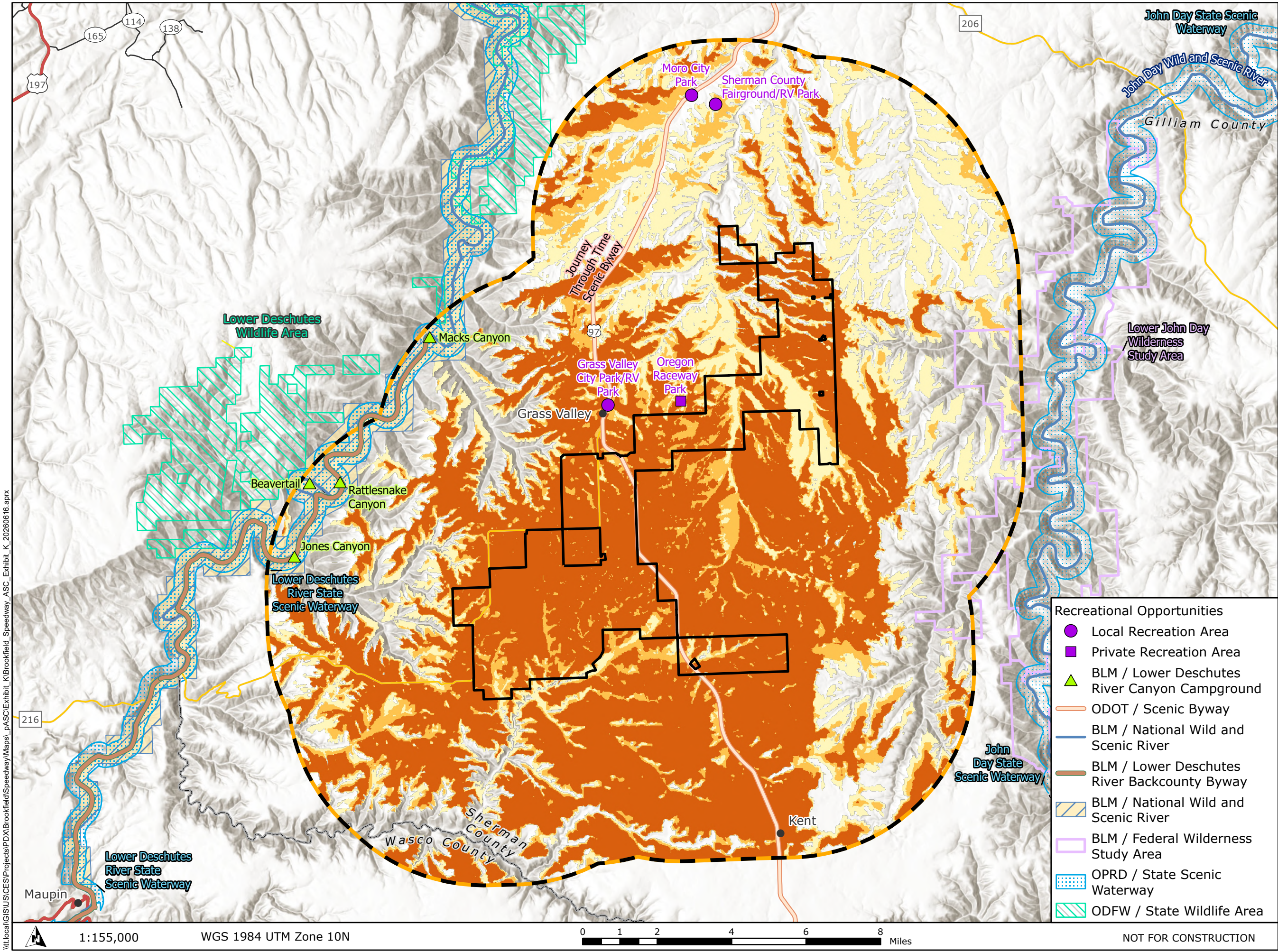
Figure K-1 Recreational Opportunities within the Analysis Area

SHERMAN COUNTY, OR

- Facility Site Boundary
 - Analysis Area (5 mile buffer)
 - City/Town
 - County Boundary
 - US Highway
 - State Highway
 - County Highway
 - Management Agency
 - Bureau of Land Management (BLM)
 - State Land
- ### Recreational Opportunities
- Local Recreation Area
 - Private Recreation Area
 - BLM / Lower Deschutes River Canyon Campground
 - ODOT / Scenic Byway
 - BLM / National Wild and Scenic River
 - BLM / Lower Deschutes River Backcountry Byway
 - BLM / National Wild and Scenic River
 - BLM / Federal Wilderness Study Area
 - OPRD / State Scenic Waterway
 - ODFW / State Wildlife Area
- TETRA TECH Speedway Energy



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Speedway Energy Facility

**Figure K-2.1
Recreational
Opportunities
Turbine Viewshed**

SHERMAN COUNTY, OR

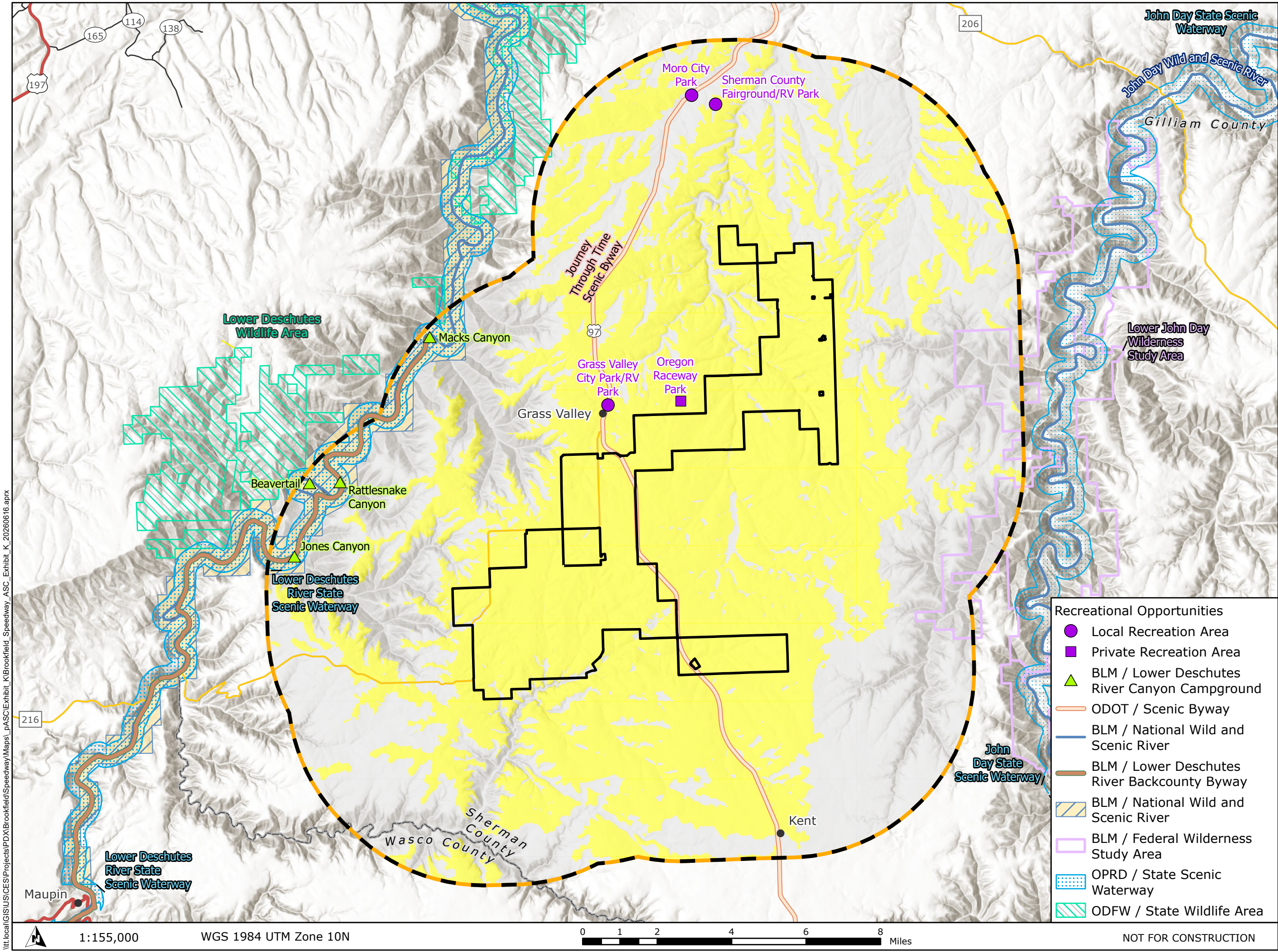
- Facility Site Boundary
 - Analysis Area (5 mile buffer)
 - City/Town
 - County Boundary
 - US Highway
 - State Highway
 - County Highway
- Number of Turbines Visible*
- 1 - 15 (Minimal)
 - 16 - 30 (Low)
 - 31 - 44 (Moderate)

* 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).

- Recreational Opportunities
- Local Recreation Area
 - Private Recreation Area
 - BLM / Lower Deschutes River Canyon Campground
 - ODOT / Scenic Byway
 - BLM / National Wild and Scenic River
 - BLM / Lower Deschutes River Backcountry Byway
 - BLM / National Wild and Scenic River
 - BLM / Federal Wilderness Study Area
 - OPRD / State Scenic Waterway
 - ODFW / State Wildlife Area



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Speedway Energy Facility

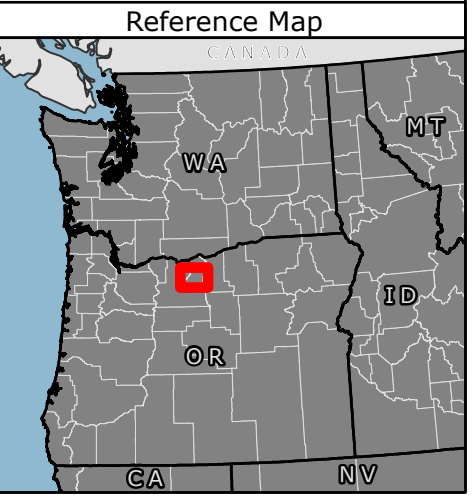
Figure K-2.2 Recreational Opportunities Solar Array Viewshed

SHERMAN COUNTY, OR

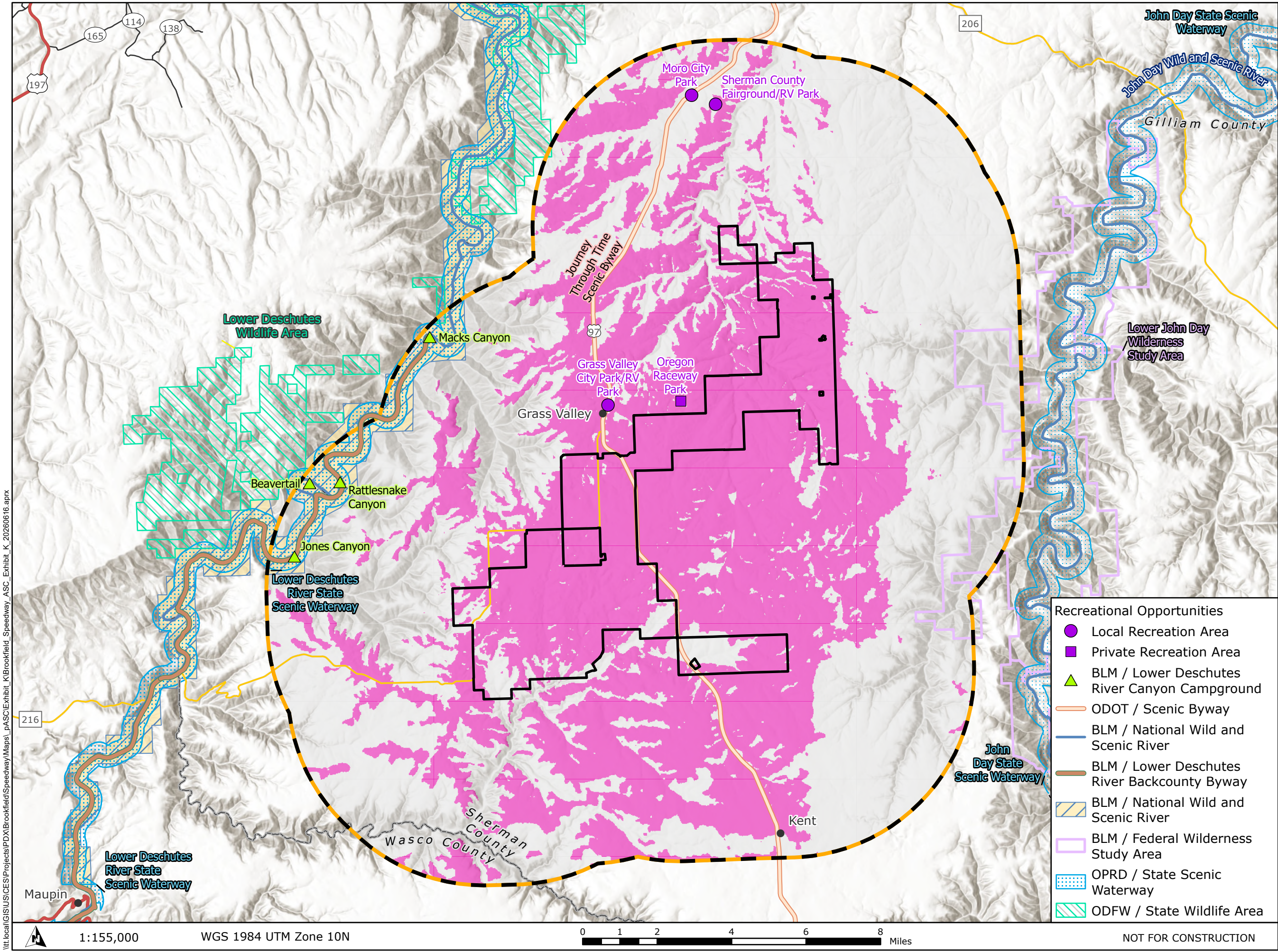
- Facility Site Boundary
- Analysis Area (5 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- County Highway
- Solar Array Visibility*
 - Not Visible
 - Potentially Visible

* 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).

- ### Recreational Opportunities
- Local Recreation Area
 - Private Recreation Area
 - BLM / Lower Deschutes River Canyon Campground
 - ODOT / Scenic Byway
 - BLM / National Wild and Scenic River
 - BLM / Lower Deschutes River Backcountry Byway
 - BLM / National Wild and Scenic River
 - BLM / Federal Wilderness Study Area
 - OPRD / State Scenic Waterway
 - ODFW / State Wildlife Area



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Speedway Energy Facility

Figure K-2.3 Recreational Opportunities Collection Line Viewshed

SHERMAN COUNTY, OR

- Facility Site Boundary
- Analysis Area (5 mile buffer)
- City/Town
- County Boundary
- Interstate Highway
- US Highway
- State Highway
- County Highway
- Collection Line Visibility*
- Not Visible
- Potentially Visible

* 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).

- ### Recreational Opportunities
- Local Recreation Area
 - Private Recreation Area
 - BLM / Lower Deschutes River Canyon Campground
 - ODOT / Scenic Byway
 - BLM / National Wild and Scenic River
 - BLM / Lower Deschutes River Backcountry Byway
 - BLM / National Wild and Scenic River
 - BLM / Federal Wilderness Study Area
 - OPRD / State Scenic Waterway
 - ODFW / State Wildlife Area



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Attachment K-1. Inventory of Recreational Opportunities in the Analysis Area

Attachment K-1. Inventory of Recreational Opportunities in the Analysis Area

Recreational Opportunity	Responsible Entity	Distance to Facility Component (miles)				Description	Importance Factors					Important Recreation Resource?
		Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
Private												
None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-Governmental Organizations												
None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Local												
Sherman County RV Park/Fairgrounds	Sherman County	3.3	7.6	3.3	5.4	The Sherman County Fairgrounds hosts the annual post-harvest fair and rodeo and the associated RV park contains not only 33 hook-ups but a playground (Sherman County 2026).	County fairgrounds	Moderate	Venue for agricultural/ ranching-related events that are important part of community social and business life.	Uncommon; one per county.	Somewhat Irreplaceable	Yes
Moro City Park	City of Moro	3.6	7.9	3.6	5.9	The Moro City Park is the sole city park, offering restrooms, a playground, picnic tables, and a basketball court (City of Moro 2026, Sherman County 2026). It also has a designated Oregon Trail wall, bike repair station, gazebo and is located adjacent to the city’s museum.	City park	Low	Typical neighborhood park with some historic-centric attractions.	Relatively uncommon in the local area.	Replaceable	No
Grass Valley City/RV Park	City of Grass Valley	0.7	1.8	0.8	1.5	The Grass Valley City Park/RV Park is the sole city park, offering restrooms, a playground, picnic tables, and an adjoined RV park (Sherman County 2026).	City park	Low	Typical neighborhood park.	Relatively uncommon in the local area.	Replaceable	No
Oregon Raceway Park	Private; Pacific Motorsports Management LLC	0.3	0.6	0.4	0.9	The Oregon Raceway Park offers a 2.3-mile road course for competitive racing of automobiles, karts, and motorcycles (City of Grass Valley 2023, Oregon Raceway Park 2026). Camping spots are also available upon request and many private clubs utilize the park due to the open track format.	None	Low-Moderate (primarily in summer or during events)	Venue for vehicle racing.	Rare; only recreational opportunity for vehicle racing in the region.	Replaceable	No

Recreational Opportunity	Responsible Entity	Distance to Facility Component (miles)				Description	Importance Factors					Important Recreation Resource?
		Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
State												
Lower Deschutes Wildlife Area	Oregon Department of Fish and Wildlife (ODFW)	4.8	5.9	4.8	6.1	The Lower Deschutes Wildlife Area runs south from the Deschutes River State Recreation Area (along the Columbia River) to southwest of Moro, Oregon. The site is popular for steelhead, salmon, and trout fishing (summer and fall), big game and upland bird hunting (fall and winter), mountain biking, hiking, boating, and wildflower viewing (year-round, wildflowers/wildlife viewing in the spring). Public access is limited to people who hike, bike or boat to the area (ODFW 2026b).	State Wildlife Area	High	Secluded access to wildlife habitat, hiking, biking, boating, hunting, and fishing opportunities along the Deschutes River.	Rare; Sole State Wildlife Area on the Deschutes River offering a relatively secluded experience for multiple recreational activities, the most popular being angle fishing and hunting.	Irreplaceable	Yes
Journey Through Time Scenic Byway (US-97)	Oregon Department of Transportation (ODOT)	Crosses	0.4	0.02	Crosses	The Journey Through Time Scenic Byway starts at Biggs Junction on I-84 and ends at Baker City in Baker County. The route passes through the agricultural fields, John Day Fossil Beds National Monument, historic mining towns and the picturesque Painted Hills (Travel Oregon 2026). The portion within the analysis area travels through undulating wheat fields between the John Day and Deschutes Rivers, with visibility of existing wind turbines.	Oregon State Scenic Byway	Moderate to High (primarily in summer)	Entire route includes diverse scenery, historic towns, a national monument, hills, and rivers.	Common; relatively common travel route in the north-central Oregon region.	Somewhat Irreplaceable	Yes
Tribal												
None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Federal												
Lower Deschutes River Canyon (Wild & Scenic River and State Scenic Waterway; including several campgrounds Jones Canyon, Beavertail, Rattlesnake Canyon, and Macks Canyon)	Bureau of Land Management (BLM; Wild and Scenic River, parks), Oregon Parks and Recreation Department (OPRD; State Scenic Waterway)	3.7	4.4	3.7	5.1	The Deschutes River is designated as a Federal Wild and Scenic River, classified as a recreational river area, and a State Scenic Waterway. Primary recreational uses include non-motorized boating, fishing, and camping; there are several small campgrounds (typically 5-20 campsites each) along the river within the analysis area that provide undeveloped facilities (e.g., picnic tables, vault toilets, campfire rings). The Lower Deschutes River Back Country Byway on the east bank of the river provides access to the river and recreational spots (BLM 2026d, BLM 2026e).	Federal Wild and Scenic River, State Scenic Waterway	High (primarily in summer)	River rafting, kayaking, and fishing are exceedingly popular on the Deschutes River. Setting and access to recreational opportunities on the Deschutes River.	Rare; There are many attractive features of the river that has made it such a popular destination such as for rafting, reliable summer water flows and numerous fun and exciting rapids.	Irreplaceable	Yes

Recreational Opportunity	Responsible Entity	Distance to Facility Component (miles)				Description	Importance Factors					Important Recreation Resource?
		Site Boundary	Turbines	Solar Array	Aboveground Collector Line		Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
Lower John Day Wilderness Study Area (WSA)	BLM	3.2	4.0	3.2	4.7	The Lower John Day Wilderness Study Area (WSA) is located along the John Day River and managed as important riparian wildlife habitat (BLM 2026c). The only legal access (i.e., outside private property) to the WSA is by floating the John Day River, with two put-in points (both of which are outside the analysis area), thus public visitation and sight-seeing recreation opportunities are anticipated to be limited.	Federal Wilderness Study Area	Low	Important wildlife habitat	Riparian wildlife habitat that is uncommon in an otherwise dry landscape.	Irreplaceable	Yes
Lower Deschutes River Back Country Byway	BLM	4.0	4.8	4.0	6.1	The Lower Deschutes River Back Country Byway winds along the east bank of the Deschutes from near the town of Maupin northward, terminating at Macks Canyon Recreation Site. The Byway is a popular river-access point for anglers and boaters. Other recreational uses include wildlife viewing, camping, hiking, and upland bird hunting access. There are no developed viewpoints or waysides in the analysis area, but BLM campsites along the Deschutes River are present (see Lower Deschutes River above; BLM 2026e).	None	Moderate (primarily in summer)	Popular access point for anglers and boaters but no developed viewpoints.	Uncommon; One of few hunting/popular angle fishing areas along this portion of the river (see Lower Deschutes Wildlife Area above).	Irreplaceable	Yes