

Request for Amendment 5 for the Biglow Canyon Wind Farm

Exhibit K. Recreation

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



Portland General Electric Company

Prepared by



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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AC	alternating current
BCWF or Facility	Biglow Canyon Wind Farm
BESS	battery energy storage system
BIGL 2 or Project Developer	BIGL 2, LLC
BLM	Bureau of Land Management
Certificate Holder or PGE	Portland General Electric Company
Council or EFSC	Oregon Energy Facility Siting Council
dBa	A-weighted decibel
gen-tie	generation tie
I-84	Interstate 84
kV	kilovolt
MW	megawatt
MWh	megawatt-hour
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODFW	Oregon Department of Fish and Wildlife
ODOE	Oregon Department of Energy
ODOT	Oregon Department of Energy
ONHT	Oregon National Historical Trail
OPRD	Oregon Department of Parks and Recreation
OR-206	Oregon Route 206
PV	photovoltaic
RFA	Request for Amendment
Site Certificate	Site Certificate on Amendment 4
Solar Facility	solar energy generation and battery storage components
US-97	U.S. Highway 97
USACE	U.S. Army Corps of Engineers
ZVI	zone of visual influence

1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) submits this Request for Amendment (RFA) 5 to the Site Certificate on Amendment 4, issued March 27, 2026 (Site Certificate) for the Biglow Canyon Wind Farm (BCWF or Facility) to add a second phase of solar photovoltaic (PV) energy generation and battery storage capacity to the BCWF following the solar power generation and battery storage capacity approved under RFA 4.

BCWF, owned and operated by PGE, is located within an approved site boundary comprising approximately 25,000 acres, approximately 2.5 miles northeast of the town of Wasco in Sherman County, Oregon (Background Exhibit Figure 1). The BCWF operates under the Site Certificate from the Oregon Energy Facility Siting Council (Council or EFSC) as administered by the Oregon Department of Energy (ODOE). BCWF currently consists of 217 operating wind turbines, with a maximum blade tip height of 445 feet, and a peak generating capacity of 450 megawatts (MW) (Wind Facility). RFA 4, approved March 27, 2026, added 125 MW alternating current (AC) generating capacity from PV solar arrays and 500 MWh in battery storage capacity. The solar energy generation and battery storage components (Solar Facility) described in RFA 4 are currently under construction.

In RFA 5, PGE proposes to add up to 200 MW AC generating capacity from PV solar arrays and 1,000 MWh in battery storage capacity (RFA 5 Solar Facility) by expanding the overall BCWF site boundary by approximately 839 acres. The RFA 5 Solar Facility is located across approximately 622 acres of the existing site boundary and 839 acres of expanded site boundary, for a total of approximately 1,461 acres (together, RFA 5 Site Boundary; see Background Exhibit Figure 4).

The RFA 5 Site Boundary provides a conservative estimate of the maximum area needed for development and micrositing through final design and construction for the RFA 5 Solar Facility, rather than the anticipated disturbance footprint. Primary infrastructure includes solar arrays, inverters, battery energy storage system (BESS) facilities and their subcomponents (i.e., inverters), one collector substation, and medium-voltage collector lines (herein collectively referred to as “Solar Components”). Additionally, the Solar Components include operations and maintenance (O&M) structures, site access roads, internal roads, perimeter fencing, facility entry gates, and temporary laydown areas. The maximum generating capacity from the Solar Components will be 200 MW AC. Power generated from the Solar Components will be transferred to the grid via a 230-kilovolt (kV) generation tie (gen-tie) transmission line, approximately 2.7 miles long. The RFA 5 Solar Facility includes the Solar Components and the gen-tie transmission line.

PGE will own and operate the RFA 5 Solar Facility as a part of the BCWF, which, to date, has been developed by BIGL 2, LLC (BIGL 2, or Project Developer). BIGL 2, in its capacity as the project developer, supports PGE in this RFA 5 and may construct and temporarily operate the RFA 5 Solar Facility on behalf of PGE under a Build-Transfer Agreement.

The information contained herein supports demonstration of compliance with the Recreation approval standard for Oregon Administrative Rules (OAR) 345-022-0100.

2.0 Analysis Area

Consistent with OAR 345-027-0360(3), ODOE concurred with the Certificate Holder's use of a defined portion of the approved BCWF site boundary and the proposed expanded site boundary (i.e., RFA 5 Site Boundary) to establish study area boundaries for RFA 5 under OAR 345-001-0010(35). The RFA 5 Site Boundary reflects the Solar Siting Area and Transmission Corridor, and all study areas within the meaning of Oregon Revised Statutes 345-001-0010(35) are measured from the RFA 5 Site Boundary. In accordance with OAR 345-001-0010(35)(d), the analysis area for recreation areas is the area within and extending 5 miles from the RFA 5 Site Boundary¹ (Figure K-1).

3.0 Recreational Opportunities Inventory – OAR 345-022-0100(5)(a)(e)

(5) To assist the Council in determining whether the standard outlined in (1) through (4) has been met, the Applicant must submit information about the impacts the proposed facility would have on important recreational opportunities in the analysis area, providing evidence to support a finding by the Council as required by OAR 345-022-0100, including:

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

[...]

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

Based on the proposed amendments (including enlargement of the approved BCWF site boundary) to the Facility in RFA 5, there are two new recreation areas located within the analysis area since the Final Order on RFA 4 was issued (see Attachment K-1);^{2,3} no recreation areas are located within or cross the RFA 5 Site Boundary. Attachment K-1 provides an inventory of the recreation areas within the analysis area. RFA 5 proposes expanding the site boundary, with much of the RFA 5 Site Boundary being contained within the approved BCWF site boundary; thus, the RFA 5 Solar Facility is located at similar distances from most of the recreation areas previously identified in RFA 4.

¹ ODOE concurred with excluding the remaining BCWF site boundary that does not overlap with the RFA 5 Site Boundary from analysis in RFA 5 because no changes are proposed to any BCWF components in the remaining BCWF site boundary as part of RFA 5.

² Final Order on Request for Amendment 4, p. 206-207 (March 2026).

³ Note that although the Journey Through Time Scenic Byway was not included as part of the RFA 4 analysis, it was previously evaluated and reviewed by the Council as described in the Final Order on RFA 3 (p. 27 [October 2008]) and previous amendments.

Therefore, the impacts are anticipated to be similar to or less than (due to the low profile of solar versus wind infrastructure) what was previously described in RFA 4 and approved in the Final Order on Amendment 4 (see Attachment K-1). Figure K-1 shows the location of the recreation opportunities identified in the analysis area in compliance with OAR 345-021-0010(1)(t)(E).

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 2021), 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 (Gilliam County 2022, Sherman County 2007);
- Internet sites maintained by recreation provider agencies, including OPRD, ODFW, Oregon Department of Transportation (ODOT), and county and city park departments (Gilliam County 2026, ODFW 2026, ODOT 2019, OPRD 2026a, OPRD 2026b, OPRD 2026c, Sherman 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 2026).

3.2 Resource Descriptions

In general, recreation activities in the analysis area consist of water-related activities, hiking, camping, hunting, horseback riding, bicycling, photography, and sightseeing. These activities also occur in numerous locations outside the analysis area, and therefore some of the recreational opportunities identified within the analysis area do not rise to the level of uniqueness or irreplaceability that is required by OAR 345-022-0100(2).

There are four identified recreational opportunities within the analysis area, two of which are new and were not previously reviewed by the Council as described in the Final Order on RFA 4 (i.e.,

Depot Park and Wasco City Park; see Attachment K-1, Figure K-1);^{4,5} no recreation areas are located within or cross the RFA 5 Site Boundary. 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

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

3.2.2 Non-Governmental Organizations

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

3.2.3 Local

The City of Wasco manages the two city parks, the Depot Park and Wasco City Park. The parks offer typical neighborhood park amenities and are considered to have low to moderate demand due to their location (Sherman County 2026). Therefore, due to the lack of demand, outstanding qualities, and replaceability, the Depot Park and Wasco City Park are not considered to be important recreational resources.

3.2.4 State

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 206 (OR-206) is within the analysis area, which does not include any associated recreational opportunities.

3.2.5 Tribal

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

⁴ Final Order on Request for Amendment 4, p. 206-207 (March 2026).

⁵ As previously reviewed and approved in the Final Order on Request for Amendment 4, although the Oregon National Historic Trail (ONHT) alignment crosses the RFA 5 Site Boundary, 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 McDonald Crossing/John Day River Crossing high-potential site—is located 8.9 miles southeast of the analysis area (NPS 1999).

3.2.6 Federal

The U.S. Army Corps of Engineers (USACE)-managed Albert Philippi Park along the John Day River offers typical river-adjacent park amenities (i.e., boat ramp, dock, bathrooms, primitive camping, trails) and is considered to have to moderate demand due to its location and depending on the season (Sherman County 2026); It is only accessible by boat. It is one of several USACE parks along the Columbia River or John Day River with comparable amenities. Therefore, due to the lack of outstanding qualities and replaceability, the Albert Philippi Park is not considered to be an important recreational resource.

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 RFA 5 Solar 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.

3.4 Importance Assessment Summary

Based on the importance criteria described above, the Journey Through Time Scenic Byway has been determined to be important for the purposes of this analysis. This resource is summarized in Attachment K-1 of this exhibit. The potential for impacts to this important recreation resource as a result of the RFA 5 Solar Facility is discussed in Section 4.

4.0 Potential Impacts – OAR 345-022-0100(5)(b)

(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 the single important recreational opportunity in the analysis area, the Journey Through Time Scenic Byway, were studied to determine whether the design, construction, and operation of the RFA 5 Solar Facility, when taking into account mitigation, would be likely to result in any significant adverse impacts. The following sections summarize the types of potential adverse impacts evaluated and provide summaries of the analysis.

4.1 Loss of Opportunity

A direct loss of opportunity occurs only where the RFA 5 Solar Facility would physically disturb the ground located within the affected recreational resource area. The RFA 5 Solar Facility would not directly impact any important recreation resource, and the Journey Through Time Scenic Byway is not within the RFA 5 Site Boundary.

An indirect loss of opportunity could occur if 1) a recreational opportunity nearby the RFA 5 Solar 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 RFA 5 Solar Facility were to alter the environment of a recreational opportunity through indirect effects that it substantially impacted the quality of the recreation experience at that site. For example, if the RFA 5 Solar Facility were to destroy intact evidence of the Oregon Trail 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 indirect loss, indirect opportunity loss due to temporary closure for safety concerns is unlikely to occur due to the Journey Through Time Scenic Byway being over 1 mile from the RFA 5 Site Boundary. Note that construction of the RFA 5 Solar Facility in general would last for up to 18 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 RFA 5 Solar Facility; the following sections analyze these three factors.

4.2 Noise Impacts

The RFA 5 Solar Facility proposes no significant additional noise impacts to recreation areas from the Facility. Exhibit O-3 provides an assessment of the existing acoustical environment and anticipated cumulative sound levels from the Facility and RFA 5 Solar Facility; the methodology for noise modeling is detailed in that exhibit. Activities associated with construction of the proposed solar areas and related or supporting facilities would be similar to the construction noise already reviewed by Council for the Facility.

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.” The Journey Through Time Scenic Byway is not considered to be a noise sensitive property.

Based on the results of operations noise modeling, described in detail in Exhibit O-3, operation of the Wind Facility plus the RFA 5 Solar Facility would not create new noise impacts to the Journey Through Time Scenic Byway beyond those that were previously identified for the Facility. As detailed in Exhibit O-3, the solar modules would create no significant operational noise, and operational noise from primarily cooling equipment associated with the BESS and electrical equipment would be similar to operational noise already reviewed by the Council for the Facility. The cumulative operational noise from the Wind Facility and RFA 5 Solar Facility would attenuate with distance. Modeled cumulative noise levels decrease to below 26 A-weighted decibels (dBA) ⁶, which is below typical nighttime background ambient noise levels, at approximately 2.4 miles from the RFA 5 Site Boundary. The Journey Through Time Scenic Byway is located approximately 2.5 miles from the RFA 5 Site Boundary and solar areas (and approximately 4.6 miles from the gen-tie line) and therefore would not be affected by cumulative operational noise from the Wind Facility and RFA 5 Solar Facility. Noise from construction would similarly be less than 26 dBA within 36.6 miles from the RFA 5 Site Boundary (daytime ambient sound level) and potentially audible at the Journey Through Time Scenic Byway. Pursuant to OAR 340-035-0035(5), noise from construction activities is exempt from the state noise standards. Construction activities associated with adding the RFA 5 Solar Facility to the Wind Facility have the potential for localized noise on a temporary basis as construction activities progress through certain locations within the RFA 5 Site Boundary. Noise-generating activities during construction could result from the use of heavy machinery, such as heavy trucks, bulldozers, graders, and cranes. Based on the estimated noise levels of construction equipment provided in Exhibit O-3, construction noise levels at the Journey Through Time Scenic Byway would peak at approximately 49 dBA; this noise level is comparable to a quiet conversation. This elevated noise level would occur sporadically while proposed RFA 5 component infrastructure such as the solar areas closest to the Journey Through Time Scenic Byway are built. As construction progresses elsewhere in the RFA 5 Site Boundary, noise levels would drop to background levels. Continued implementation of Site Certificate Condition CON-NC-01 would help reduce construction noise impacts through the requirement of exhaust mufflers on combustion engine-powered equipment, confining the noisiest operation of heavy construction equipment to daylight hours, and establishment of a noise complaint response system. At this time, pending geotechnical investigation of the final layout, blasting is not anticipated to be required for proposed RFA 5 component construction.

The Council previously found that the Facility noise would not result in a significant adverse impact to important recreation areas⁷ and the amendments in RFA 5 do not alter that conclusion.

⁶ Note that the 26 dBA value was selected as representative because OAR 340-035-0035(1)(b)(B)(iii)(I) allows for an assumed ambient sound level of 26 dBA for wind energy facilities. Site-specific ambient sound data was not collected for the amended BCWF, but 26 dBA is assumed to be a conservative estimate.

⁷ Final Order on Request for Amendment 4, p. 208 (March 2026).

4.3 Traffic Impacts

Traffic impacts in general are addressed in greater detail in Exhibit L, including information on anticipated traffic levels and typical travel routes for the RFA 5 Solar Facility.

Based on the analysis provided in Exhibit L, the primary transportation route used for construction of the RFA 5 Solar Facility would be the same as what was already evaluated for the Facility. The primary route for construction-related traffic would be Interstate 84 (I-84) to south on U.S. Highway 97 (US-97) to Wasco, southeast on OR-206, east on either Klondike Road or the Old Wasco Heppner Highway, and then onto various County roads. The secondary route for strictly construction-related commuter traffic would be I-84 to south on Scott Canyon Road to either Herin Lane or Medler Lane; this route is not suitable for oversize/overweight traffic. The Journey Through Time Scenic Byway is accessed by roads anticipated to carry proposed RFA 5 component-related truck traffic. Construction worker traffic may occur on roads providing access to the Journey Through Time Scenic Byway; however, construction worker traffic would be dispersed on multiple roads throughout the area, and the nominal level of worker traffic anticipated on roads other than I-84, US-97, and OR-206 would not adversely affect level of service on those roads (see Exhibit L).

Timing patterns for construction-related traffic and recreational traffic to the Journey Through Time Scenic Byway would likely differ substantially. Construction traffic would primarily be dispersed throughout the business work week and primarily during commuter hours, whereas peak recreational traffic would be greatest during the weekend. Additionally, no roads providing access to the Journey Through Time Scenic Byway is expected to be closed during construction or operation of the RFA 5 Solar Facility.

The Journey Through Time Scenic Byway is accessed from US-97. The temporary construction-related traffic created on US-97 and OR-206 is anticipated to be inconsequential because they were constructed to design, safety, and load-bearing standards (see Exhibit L).

Temporary, short-term delays are most likely to occur only during deliveries of oversized loads, which would occur sporadically and would be accompanied by traffic control teams. Construction of the RFA 5 Solar Facility in general would be short in duration (lasting up to 18 months) and thus any construction traffic impacts would be temporary.

Although there would be no significant traffic impacts to the Journey Through Time Scenic Byway, the Certificate Holder would continue to implement Site Certificate PRE-PS-02, which requires adhering to various traffic control measures through implementation of a Construction Traffic Management Plan or Road Use Agreement. The Certificate Holder would submit a Traffic Management Plan to ODOE for approval in consultation with Sherman County Public Works Department. Site Certificate PRE-PS-02 also requires execution of a Road Use Agreement such that any damage or wear to county roads from proposed RFA 5 component construction would be repaired and restored. Therefore, no significant adverse traffic impacts to the Journey Through Time Scenic Byway is anticipated from construction of the RFA 5 Solar Facility.

During operations, traffic would be minimal, as the RFA 5 Solar Facility would permanently employ up to four personnel. Solar and BESS-related equipment would require periodic maintenance, but

traffic associated with repair or maintenance visits would be low and daily traffic generated by operation of the RFA 5 Solar Facility is not expected to affect operations of any of the state or local county roads used to access the Journey Through Time Scenic Byway within the analysis area.

The Council previously found that the construction and operational traffic would not be likely to result in significant adverse impacts to important recreation areas within the analysis area,⁸ and the amendments in RFA 5 do not alter that conclusion.

4.4 Visual Impacts

The inclusion of the additional solar modules and associated infrastructure at the RFA 5 Solar Facility would result in a change to the existing viewshed, but this change would not result in a significant visual impact to the Journey Through Time Scenic Byway due to overall height of infrastructure, distance to the RFA 5 Solar Facility, topographical screening, low impact to users, no specified management of scenic or visual qualities beyond the boundaries of each important recreation area, and presence of similar structures within the existing viewshed (e.g., existing wind and utility infrastructure). To reduce visual impacts to the Journey Through Time Scenic Byway, Site Certificate Conditions GEN-WF-03 and GEN-LU-12 would continue to be implemented, which requires the usage of low-reflective, neutral finishes on the O&M building, BESS, and substation and enforces signage restrictions. The BESS and substation would be designed and constructed to be consistent with the character of buildings in the surrounding area and painted in a neutral color, per Site Certificate Conditions GEN-WF-04 and GEN-LU-12. Exterior nighttime lighting would continue to be restricted to security lighting at the O&M building and substation, and as necessary for repairs, emergencies, according to Site Certificate Conditions GEN-WF-05 and GEN-LU-12. Additionally, all lighting shall be limited in intensity, shielded, and directed downward to prevent the lighting from projecting onto adjacent properties and roadways (Site Certificate Conditions GEN-WF-05 and GEN-LU-12).

The RFA 5 Solar Facility would not generate any emissions plumes and so would not cause any visual impacts from air emissions. Potential visual impacts due to dust created during construction of the RFA 5 Solar Facility would be largely prevented by following best management practices for dust control as detailed in Exhibits C and O-2.

4.4.1 Visual Impact Assessment Methodology

The potential for visual impacts from the RFA 5 Solar Facility is primarily related to the components that would be the most prominent in terms of size and scale. The two most prominent components in terms of height off the ground and overall surface area include the solar areas and the 230-kV gen-tie line. Thus, these two components were the main focus of the visual impact assessment.

A zone of visual influence (ZVI) analysis, also known as a viewshed analysis, was performed using Esri geographic information system software and a bare-earth 10-meter digital elevation model to

⁸ Final Order on Request for Amendment 4, p. 207 (March 2026).

identify those areas from which the solar areas and the gen-tie line might be visible (Figures K-2 and K-3). The ZVI analysis assumed a maximum height of 15 feet for the solar modules and maximum height of 140 feet for the gen-tie line. All other components proposed with RFA 5 were deemed less visually impactful (due to height, being dispersed throughout the RFA 5 Site Boundary, or adjacent to taller infrastructure, etc.) and addressed by the assessment of the solar areas and gen-tie line. A typical viewing height of 1.8 meters (6 feet) was assumed.

Visibility of the two components was defined by visible or not visible, indicated by color coding (see Figures K-2 and K-3), and by proximity, i.e., foreground (less than 0.5 mile), 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 RFA 5 Solar Facility would affect visual resources. The zones are defined by their distance from the RFA 5 Site Boundary. These zones establish a reference for evaluating how project details influence visual resources. They are defined by their distance from the RFA 5 Solar Facility as follows (BLM 1986):

- **Foreground/Middleground.** This distance zone (between 0 and 5 miles) is considered to be the range from which RFA 5 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.

It should be noted that this bare-earth modeling approach (based only on the effects of terrain on visibility) results in a highly conservative assessment of potential visibility for several reasons. First, a bare-earth analysis does not take into account the effects of vegetation or buildings, which would in practice block or screen views in some places. Finally, the model does not account for distance, lighting, weather, and atmospheric attenuation factors that diminish visibility under actual field conditions. The solar modules would be the most visible components within the solar areas (see RFA 5 Background Information Exhibit for full description). The visibility of the solar modules within the solar areas would depend primarily on topographic or other view obstructions

and the distance from the viewer to the solar areas. With a maximum height of 15 feet to the top edge of the solar module when fully tilted, the modules would not be visible from sites lower in elevation than the area on which the solar modules are constructed. From sites that are similar in elevation to the solar modules, viewers would see 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 modules, especially if the view direction is toward the angle at which the module is tilted toward the sun. To the extent practicable, reflectivity of solar modules would be minimized. Antireflective coating would be used to reduce glare, and the surface of the modules would have high transmittance to increase the amount of light reaching the photovoltaic cells. With these methods, the modules would be less reflective than a natural water body or a coated glass surface that is not antireflective.

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

A glare analysis was also performed, using the Sandia Laboratories' Solar Glare Hazard Analysis Tool. The glare analysis results have been summarized in regard to the Journey Through Time Scenic Byway; see Exhibit I for the full methodology.

4.4.2 Visual Impact Assessment Results

Based on the results of the ZVI analysis, there is the potential for visibility of some portions of the RFA 5 Solar Facility from the Journey Through Time Scenic Byway (see Figures K-2 and K-3). The visibility of the solar areas and gen-tie line are characterized as visible or not visible. The discussion below provides additional detail on the updated visual impact analysis that was conducted for RFA 5.

Potential visibility is one of several factors that comprise an assessment of visual impact to an important recreation area. Other factors to consider include the existing visual context, particularly other sources of visual contrast present within the view; the likely number and nature of visitors to a recreation area; and whether there is any management direction related to preservation of scenic quality (see Exhibit I), either within the recreation area or outside of it.

Again, the proposed solar areas and gen-tie line would potentially be visible from the Journey Through Time Scenic Byway (ranging from 2.5 miles from the solar areas to 4.6 miles from the gen-tie line). Views of the RFA 5 Solar Facility would be from a middleground viewing distances from the Journey Through Time Scenic Byway, where both the low-profile solar modules and gen-tie line would occupy a limited portion of the total viewshed. Existing views already include wind farms, transmission lines, industrial development, and agricultural irrigation equipment so the RFA 5 Solar Facility would not introduce a new or unusual feature to the view. In addition, potential views of the RFA 5 Solar Facility from the Journey Through Time Scenic Byway would be partially to fully screened in some areas by terrain and man-made structures.

The associated visual impacts at the Journey Through Time Scenic Byway were found to be similar to or less than those at the Facility.⁹ The following paragraphs provide a more in-depth visual impact assessment for this important recreation area.

4.4.2.1 Journey Through Time Scenic Byway (US-97)

The 286-mile Journey Through Time Scenic Byway starts at Biggs Junction along US-97 through the analysis area to Shaniko, where it turns east and eventually travels to Baker City. The Byway is assumed to be a heavily used route in the north-central Oregon region and is located 2.5 miles southwest of the RFA 5 Site Boundary; approximately 9 miles of the Byway are within the analysis area. There are no developed scenic overlooks or waysides along the Byway within the analysis area; nevertheless, sightseeing and road touring are considered to be the primary recreational uses along the Byway. The route within the analysis area passes through agricultural land, near Oregon Trail segments, and existing wind farms (Travel Oregon 2026). 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 (Michael Wetter & Associates 1996, ODOT 2023, Sherman County 2007; see Exhibit I).

The overall visual impact from the solar areas and gen-tie line on the Journey Through Time Scenic Byway would be negligible. The ZVI analysis demonstrates only intermittent visibility of the solar areas and gen-tie line along a small portion of the Byway within the analysis area from a middleground viewing distance (see Figures K-2 and K-3). No significant amounts of glare are predicted for this resource (see Exhibit I for further discussion). The solar array would introduce dark colors, geometric shapes, and horizontal and vertical lines into the landscape setting. Views of the gen-tie line would be similar to the other power lines in the area. Views of both the solar areas and gen-tie line are anticipated to be intermittent and subordinate to the existing landscape due to existing wind and utility infrastructure in the viewshed, and topographical screening limiting RFA 5 Solar Facility visibility. Visual impacts from the RFA 5 Solar Facility would be transient in nature, experienced by drivers as they pass near the RFA 5 Solar Facility. Thus, the solar areas and gen-tie line would not represent a new or unusual feature in the viewshed and would create—at most—weak additional contrast within the current visual context. Therefore, due to the distant proximity, topographical screening, and existing views of other wind farms and utility infrastructure from the Journey Through Time Scenic Byway, visual impacts from the RFA 5 Solar Facility are anticipated to be negligible.

4.5 Summary of Impacts

The analysis area contains one important recreation area, the Journey Through Time Scenic Byway. The Certificate Holder analyzed potential impacts to these areas and concluded as follows:

⁹ Final Order on Request for Amendment 4, p. 208 (March 2026).

- Direct or Indirect Loss. The RFA 5 Solar Facility have been designed to avoid direct loss to all important and identified recreational opportunities, and any indirect disturbance effects would not lead to an indirect loss of any important or identified recreational opportunities.
- Noise. Based on the results of the noise modeling presented in Exhibit O-3, operational noise was determined to likely be less than 26 dBA at the Journey Through Time Scenic Byway, which is consistent with a rural nighttime background ambient according to OAR 340-035-0035. Construction noise may be audible at the Journey Through Time Scenic Byway; however, construction noise would be short term and intermittent, and would not be considered a significant impact to the Journey Through Time Scenic Byway. Therefore, the amended BCWF would result in no significant difference in operational or construction noise at the Journey Through Time Scenic Byway within the analysis area relative to the Facility.
- Traffic. Construction and operations traffic for the RFA 5 Solar Facility would not alter the previous analysis demonstrating that Facility-related traffic would not be sufficiently high, nor located to significantly impact the Journey Through Time Scenic Byway. Some short-term, intermittent, and temporary delays may be experienced during RFA 5 Solar Facility construction by visitors; however, these would be temporary and traffic conditions would return to typical low levels following construction. Therefore, consistent with previous conclusions for the Facility, there would be no significant impact to traffic resulting from the construction or operation of the RFA 5 Solar Facility.
- Visual. The RFA 5 Solar Facility would potentially be visible intermittently from the Journey Through Time Scenic Byway (middleground views). However, due to the overall height of RFA 5 Solar Facility, distance from the RFA 5 Solar Facility, topographic obstructions, other features within view (i.e., wind turbines and other utility infrastructure), low impact to users, an overall lack of management direction applicable to scenic quality beyond the boundaries of the Journey Through Time Scenic Byway, and no significant amounts of glare, the RFA 5 Solar Facility would not alter the Council's previous finding that the BCWF would not have a significant visual impact on the Journey Through Time Scenic Byway.

5.0 Avoidance and Mitigation – OAR 345-022-0100(5)(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 RFA 5 Solar Facility would have no significant, direct adverse impact on any important recreational opportunity in the analysis area. There would also be no indirect disturbance effects associated with traffic, noise, or visual aspects of the RFA 5 Solar Facility that would lead to an indirect loss of any important or identified recreational opportunity. Consequently, no mitigation measures for recreation are proposed.

6.0 Monitoring Program – OAR 345-022-0100(5)(f)

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

Because construction and operation of the RFA 5 Solar Facility would have no significant adverse impacts on recreational opportunities in the analysis area, and no mitigation specific to recreation is warranted or proposed, no monitoring program for recreation is proposed.

7.0 References

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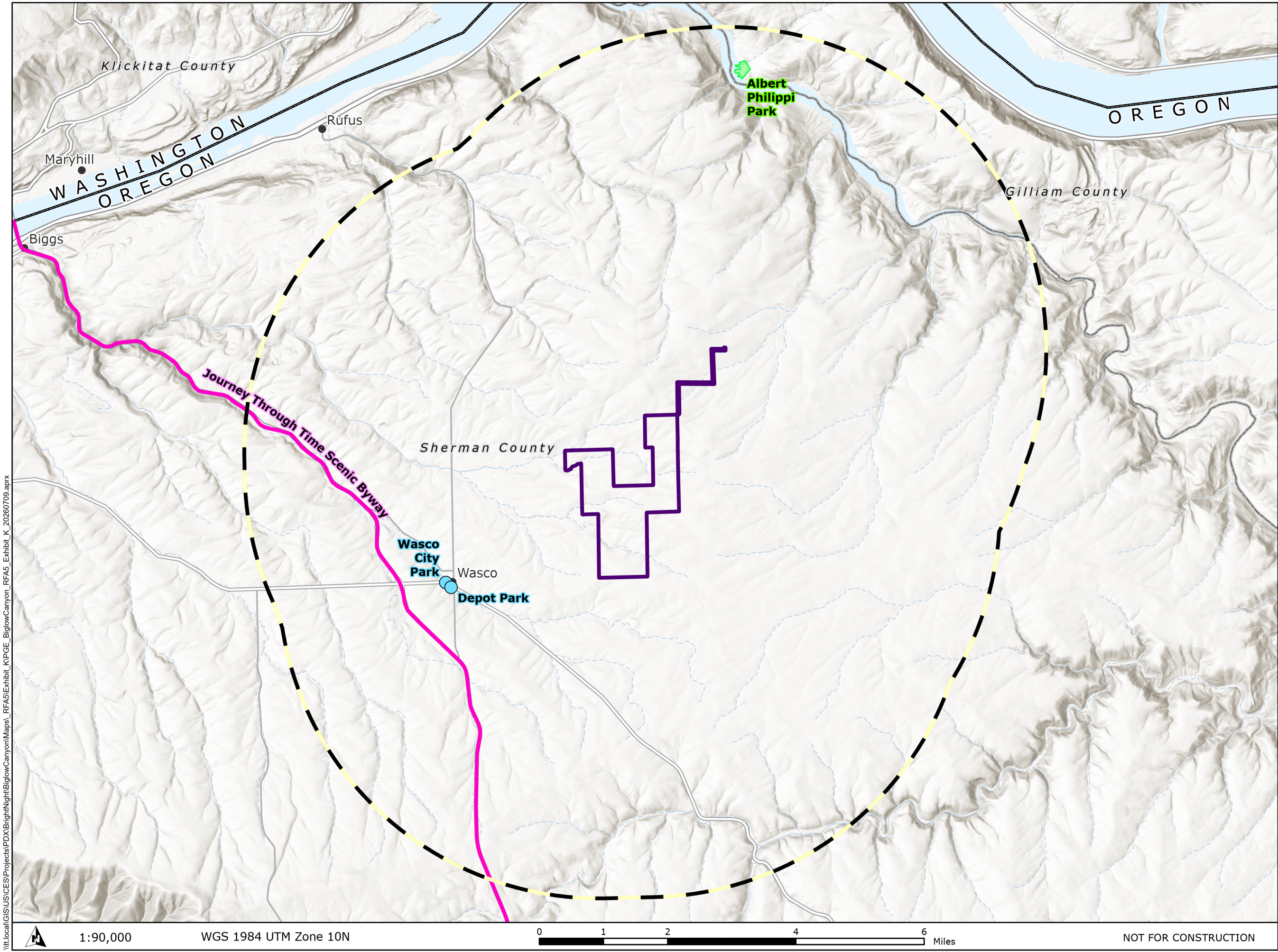
8.0 Approval Standards and Submittal Requirements

Table K-1. 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
(4) The Council must apply the version of this rule adopted under Administrative Order EFSC 1-2002, filed and effective April 3, 2002, to the review of any Application for Site Certificate or Request for Amendment that was determined to be complete under OAR 345-015-0190 or 345-027-0363 before the effective date of this rule. Nothing in this section waives the obligations of the certificate holder and Council to abide by local ordinances, state law, and other rules of the Council for the construction and operation of energy facilities in effect on the date the site certificate or amended site certificate is executed.	N/A
Submittal Requirements	
(5) To assist the Council in determining whether the standard outlined in (1) through (4) has been met, the Applicant must submit information about the impacts the proposed facility would have on important recreational opportunities in the analysis area, providing evidence to support a finding by the Council as required by OAR 345-022-0100, including:	-
(a) A description of the recreational opportunities in the analysis area that includes information on the factors listed in OAR 345-022-0100(1) as a basis for identifying important recreational opportunities;	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

Requirements	Location
(D) Visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality.	Figures K-2, K-3, Section 4.4
(c) An evaluation of the significance of the potential adverse impacts identified under subsection (b);	Section 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

Figures



Biglow Canyon Wind Farm Request for Amendment #5

Figure K-1 Recreation Areas within the Analysis Area

SHERMAN COUNTY, OR

- RFA5 Site Boundary
- Recreation Areas Analysis Area (5-mile buffer)
- State Boundary
- County Boundary
- City/Town

Recreation Areas

- USACE Parks
- Scenic Byway (ODOT)
- Local Recreation Area (City of Wasco)

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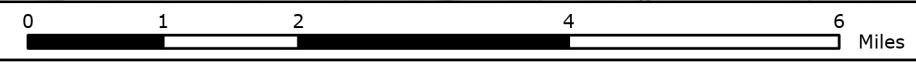
Reference Map

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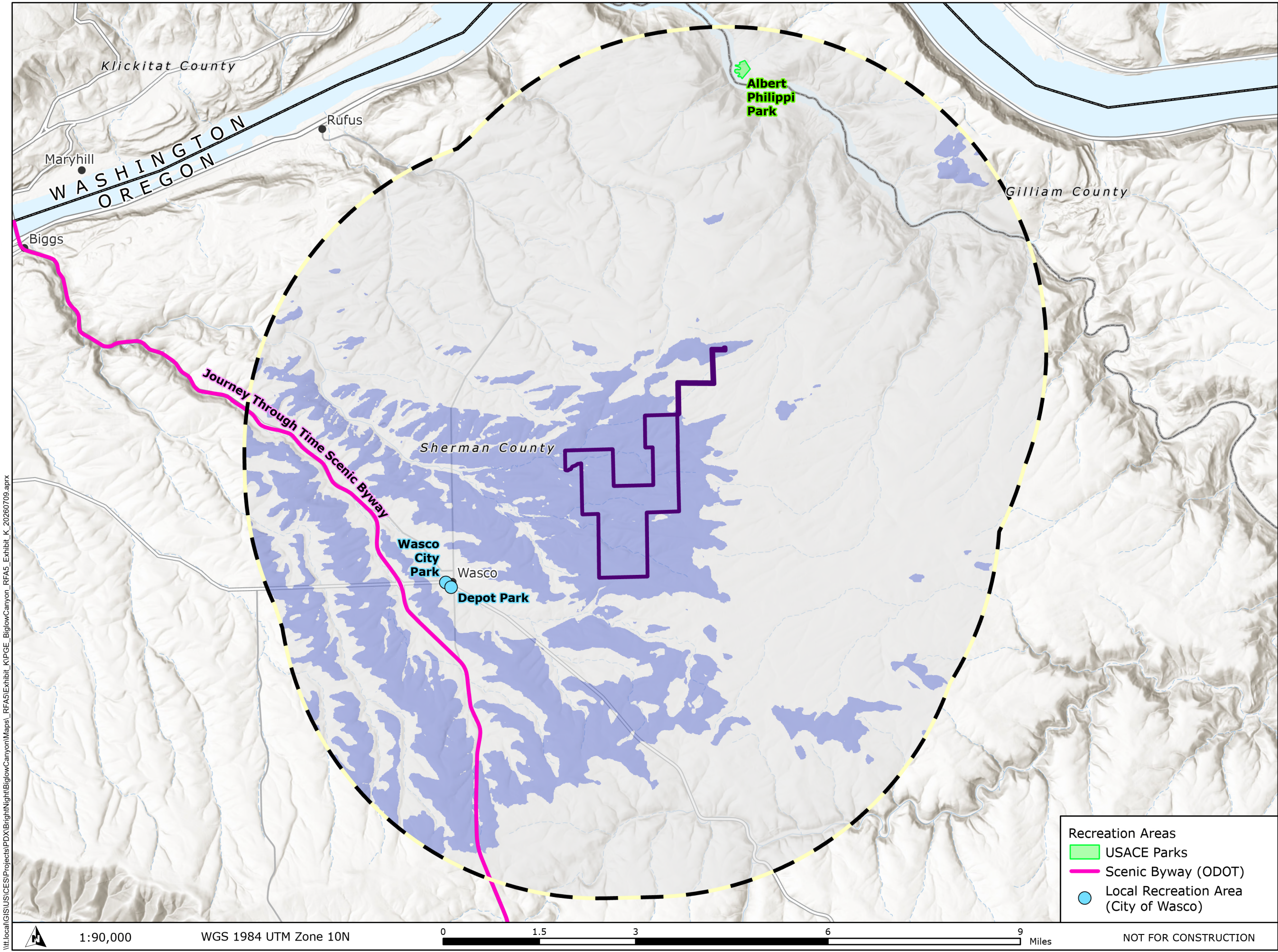


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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION



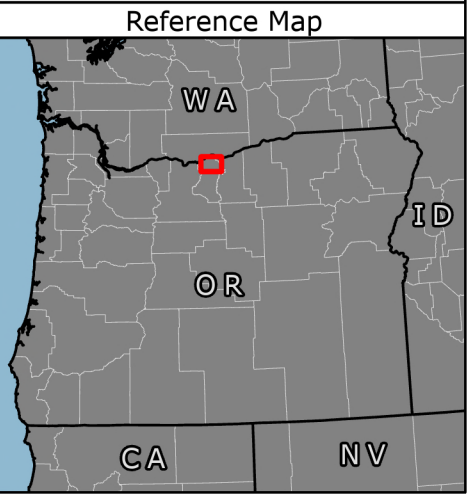
Biglow Canyon Wind Farm Request for Amendment #5

**Figure K-2
Zone of Visual Influence
Map, Solar Array**

SHERMAN COUNTY, OR

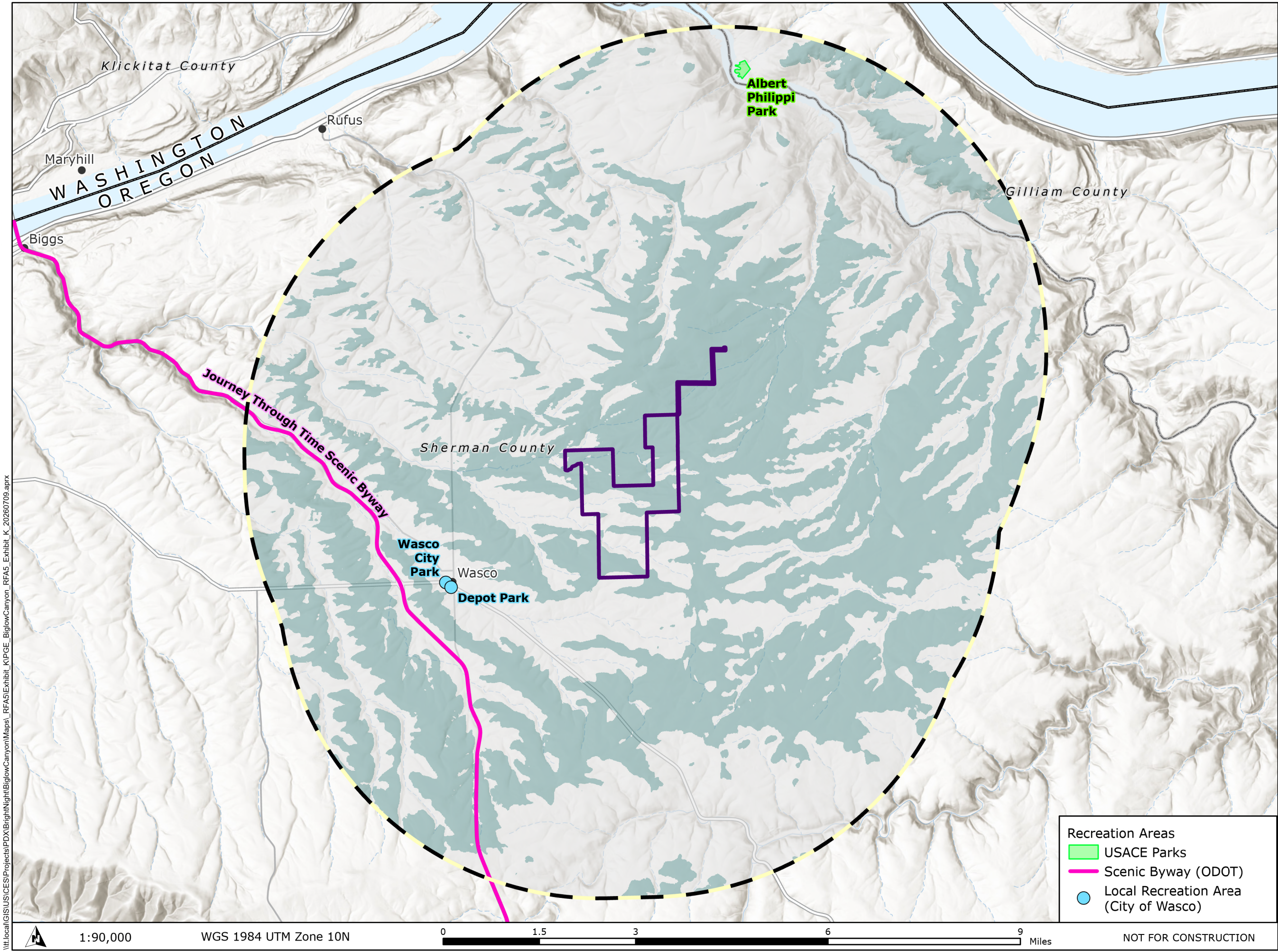
- RFA5 Site Boundary
- Recreation Areas Analysis Area (5-mile buffer)
- State Boundary
- County Boundary
- City/Town
- Solar Array Visibility***
 - Solar Array Not Visible
 - Solar Array Potentially Visible

*Potential solar array visibility calculated using a 10 meter bare-earth digital elevation model with panel heights of 15 feet (4.572 meters) and a viewing height of 6 feet (1.8 meters).



- Recreation Areas**
- USACE Parks
 - Scenic Byway (ODOT)
 - Local Recreation Area (City of Wasco)

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Biglow Canyon Wind Farm Request for Amendment #5

**Figure K-3
Zone of Visual Influence
Map, Gen-tie Line**

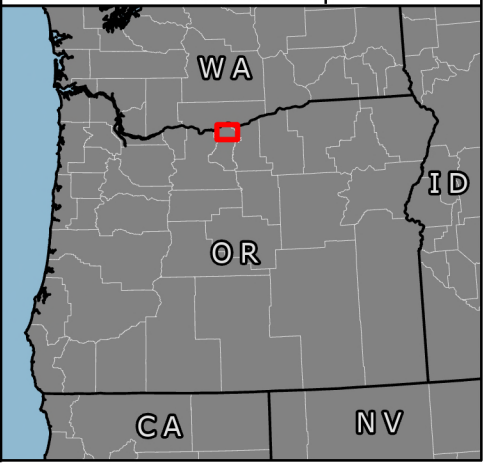
SHERMAN COUNTY, OR

- RFA5 Site Boundary
- Recreation Areas Analysis Area (5-mile buffer)
- State Boundary
- County Boundary
- City/Town
- Gen-tie Visibility*
 - Transmission Line Not Visible
 - Transmission Line Potentially Visible

*Potential transmission line visibility calculated using a 10 meter bare-earth digital elevation model with gen-tie structure heights of 160 feet (48.768 meters) and a viewing height of 6 feet (1.8 meters).



Reference Map



- Recreation Areas**
- USACE Parks
 - Scenic Byway (ODOT)
 - Local Recreation Area (City of Wasco)

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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 <div>Green shading indicates new recreation area since RFA 4</div>	Responsible Entity	Distance to RFA 5 Site Boundary (miles)			Description	Importance Factors					Important Recreation Resource?
		RFA 5 Site Boundary	Solar Areas	Gen-tie 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
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
Local											
Depot Park	City of Wasco	2.3	2.3	3.9	The park is located off OR-206 and has a play area, picnic tables, restrooms, covered areas, barbeque area, and a skatepark (Sherman County 2026). The site also allows biking and pets and hosts an explorable, retired Union Pacific railroad caboose.	N/A	Low to moderate (primarily in summer and fall)	Developed park with a skatepark, close proximity to a state highway, and facilities and services available within an urbanized community.	One of two city parks.	Replaceable	No
Wasco City Park	City of Wasco	2.4	2.4	4.0	The park is located off OR-206 and has picnic tables and a barbeque pit (Sherman County 2026).	N/A	Low to moderate (primarily in summer and fall)	Park with close proximity to a state highway and facilities and services available within an urbanized community.	One of two city parks.	Replaceable	No
State											
Journey Through Time Scenic Byway (US-97)	Oregon Department of Transportation (ODOT)	2.5	2.5	4.6	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

Recreational Opportunity <div>Green shading indicates new recreation area since RFA 4</div>	Responsible Entity	Distance to RFA 5 Site Boundary (miles)			Description	Importance Factors					Important Recreation Resource?
		RFA 5 Site Boundary	Solar Areas	Gen-tie Line		Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
Federal											
Albert Philippi Park	U.S. Army Corps of Engineers	4.2	5.4	4.2	The U.S. Army Corps of Engineer’s (USACE) Albert Philippi Park offers river access and developed camping opportunities (Sherman County 2026).	N/A	Moderate (primarily in summer and fall)	Developed park with camping and river access facilities.	Common; One of several USACE parks along the Columbia River or John Day River (all offering similar amenities).	Replaceable	No