

**EXHIBIT T  
RECREATIONAL FACILITIES AND OPPORTUNITIES**

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

**TABLE OF CONTENTS**

		<b>Page</b>
T.1	INTRODUCTION.....	T-1
T.2	RECREATIONAL OPPORTUNITIES IN THE ANALYSIS AREA.....	T-2
	T.2.1 Recreational Opportunities that Meet the Criteria of Important.....	T-5
	T.2.1.1 Overview.....	T-5
	T.2.1.2 Lost Forest-Sand Dunes-Fossil Lake Area of Critical Environmental Concern (ACEC).....	T-5
	T.2.1.3 Sand Dunes Wilderness Study Area (WSA).....	T-5
T.3	SIGNIFICANT POTENTIAL ADVERSE IMPACTS .....	T-5
T.4	MITIGATION MEASURES .....	T-6
T.5	MAP OF ANALYSIS AREA .....	T-6
T.6	MONITORING PROGRAM.....	T-7
T.7	SUMMARY.....	T-7
T.8	REFERENCES.....	T-7

**TABLE**

T-1	Summary of Recreational Importance Evaluation.....	T-3
-----	--	-----

**FIGURE**

T-1	Recreational Opportunities within 5 Miles of the Facility Site Boundary	
-----	---	--



## T.1 INTRODUCTION

Archway Solar Energy LLC (Applicant) proposes to construct the Archway Solar Energy Facility (Facility) in Lake County, Oregon, with generating capacity of up to 400 megawatts (MW). The Facility may also contain a battery energy component with storage capacity of up to 400 MW and discharge capacity of up to 1,600 megawatt-hours. This Exhibit presents an analysis of recreational facilities and opportunities within a specified distance of the Facility, as required by OAR 345-021-0010(1)(t).

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

**Response:** To issue a site certificate for a proposed energy facility, OAR 345-022-0100(1) states that “the Council must find that the design, construction, and operation of a facility, taking into account mitigation, are not likely to result in significant adverse impact to important recreational opportunities in the analysis area as described in the project order.” As defined in OAR 345-001-0010, the analysis area for impacts on recreational opportunities is 5 miles. Further, OAR 345-022-0100 provides factors that the Council will consider in judging the importance of a recreational opportunity. Specifically, OAR 345-022-0100 provides the following:

*(1) Except for facilities described in section (2), to issue a site certificate, the Council must find that the design, construction and operation of a facility, taking into account mitigation, are not likely to result in a significant adverse impact to important recreational opportunities in the analysis area as described in the project order. The Council shall consider the following factors in judging the importance of a recreational opportunity:*

- (a) Any special designation or management of the location;*
- (b) The degree of demand;*
- (c) Outstanding or unusual qualities;*
- (d) Availability or rareness;*
- (e) Irreplaceability or irretrievability of the opportunity.<sup>1</sup>*

The Applicant provides the following information to demonstrate that the Facility, taking into account mitigation, will not result in significant adverse impacts on any important recreational opportunities in the 5-mile analysis area.

---

<sup>1</sup> While OAR 345-022-0100(1)(e) does not explain the terms “irreplaceability or irretrievability” for the purpose of this rule, within its context, the Applicant believes that the rule asks whether there are other recreational opportunities within the 5-mile analysis area that could provide the same types of recreational opportunities in the event that a specific recreation facility is closed or otherwise unable to provide services to the surrounding population.

## T.2 RECREATIONAL OPPORTUNITIES IN THE ANALYSIS AREA

**OAR 345-021-0010(1)(t)(A)** *A description of the recreational opportunities in the analysis area that includes information on the factors listed in OAR 345-022-0100(1) as a basis for identifying important recreational opportunities.*

**Response:** The analysis area for impacts on recreational opportunities includes the area within the Facility site boundary and extends 5 miles beyond the Facility site boundary, as shown on Figure T-1. In general, recreational activities within the analysis area include wildlife viewing, camping, hiking, photography, and off-highway vehicle use. There are no recreational opportunities within the Facility site boundary.

OAR 345-022-0100 prescribes criteria used to evaluate a recreational opportunity's relative importance: any special designation or management, degree of demand, outstanding or unusual qualities, availability or rareness, and irreplaceability or irretrievability of the opportunity.

The potential importance of recreational opportunities within the 5-mile analysis area, as shown on Figure T-1, was evaluated. Based on this evaluation, two important recreational opportunities have been identified in the analysis area. Table T-1 provides a summary of this analysis in accordance with the criteria outlined in OAR 345-022-0100.

Table T-1. Summary of Recreational Importance Evaluation

Recreational Opportunity	Distance from Facility Site Boundary to Nearest Point of	Special Designation/ Management	Degree of Demand	Outstanding/ Unusual Quality	Availability/ Rareness	Irreplaceability /Irretrievability	Recreational Importance
	Recreational Opportunity <sup>a</sup>						
Lost Forest-Sand Dunes-Fossil Lake ACEC	4.5	Lakeview Resource Management Plan / BLM	Moderate	Lost Forest is an unusual stand of ancient ponderosa pine forest; primitive camping and popular with OHV users.	Uncommon	Somewhat irreplaceable	Important
Sand Dunes Wilderness Study Area	4.6	WSA was included in the Final Oregon Wilderness Environmental Impact Statement filed in February 1990 / BLM	Moderate	Large inland shifting sand dune system; primitive camping and OHV use	Uncommon	Somewhat irreplaceable	Important

<sup>a</sup> Approximate distances provided are measured from the Facility site boundary to the nearest point of the recreational opportunity.

## Notes:

- ACEC = Area of Critical Environmental Concern
- BLM = Bureau of Land Management
- OHV = Off-highway vehicle

## **T.2.1 Recreational Opportunities that Meet the Criteria of Important**

### **T.2.1.1 Overview**

The Applicant identified two recreational opportunities that meet the criteria of important. Both recreational opportunities occur outside the site boundary and within the 5-mile analysis area. Sections T.2.1.2 and T.2.1.3 describe the recreational opportunities with information on the factors listed in OAR 345-022-0100(1). The analysis is summarized in Table T-1. Figure T-1 shows the approximate locations of the recreational opportunities.

### **T.2.1.2 Lost Forest-Sand Dunes-Fossil Lake Area of Critical Environmental Concern (ACEC)**

The Lost Forest-Sand Dunes-Fossil Lake ACEC is located approximately 4.5 miles north of the Facility site boundary and only a small portion of the ACEC is within the 5-mile analysis area, as seen on Figure T-1. The ACEC is managed by the BLM in accordance with the Lakeview Resource Management Plan and Record of Decision (BLM 2003). Based on this management plan, the primary recreational opportunity is off-highway vehicle (OHV) use. OHV use is limited to designated roads and trails in the Lost Forest Research Natural Area (RNA), while most of the Sand Dunes is open to OHV use. Fossil Lake is limited to walk-in traffic only.

The ACEC is the largest inland shifting sand dune system in the Pacific Northwest. With approximately 8,900 acres of the Sand Dunes open to vehicle use it is popular with OHV users. The Lost Forest RNA is an unusual stand of ancient ponderosa pine forest, the remnant of a forest that existed in a cooler and wetter age, and Fossil Lake is a site of paleontological work for over 100 years (BLM 2022a).

Lost Forest-Sand Dunes-Fossil Lake ACEC is uncommon but not totally unique as there are similar OHV use areas. The Lost Forest is somewhat irreplaceable given its nature. As an uncommon and somewhat irreplaceable recreational opportunity, the ACEC meets the criteria prescribed in OAR 345-022-0100 for importance.

### **T.2.1.3 Sand Dunes Wilderness Study Area (WSA)**

The Sand Dunes WSA managed by BLM contains 16,040 acres and is located 4.6 miles north of the Facility site. Only a small portion of the WSA is within the 5-mile analysis area, as seen on Figure T-1. The majority of the Sand Dunes WSA overlaps with the Lost Forest-Sand Dunes-Fossil Lake ACEC and is characterized by unstabilized sand dunes up to 60 feet high. Vegetation exists between the dunes and surrounding ephemeral seeps. The sand dunes are open to vehicles equipped for travel across sand or snow (BLM 2022b).

The Sand Dunes WSA is uncommon but not totally unique as there are similar OHV use opportunities in the area.

## **T.3 SIGNIFICANT POTENTIAL ADVERSE IMPACTS**

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

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

**Response:** For the purpose of this Exhibit, a direct loss is assumed to occur when the Facility’s construction or operation affects a recreational opportunity by destroying or directly altering the resource so that it no longer exists in its current state (for example, demolishing a park). An indirect loss is assumed to occur when the Facility’s construction or operation limits access or otherwise alters a significant aspect of the recreational opportunity in a way that the opportunity may still exist, but that it cannot be enjoyed or used as it has been historically (for example, completely blocking a view from a scenic overlook or imposing such a nuisance impact as to render a recreational area unusable).

The Facility will not occur within the boundaries of any of the important recreational opportunities identified in Table T-1. As such, no recreational opportunity will be destroyed or directly altered as a result of Facility construction or operation. Therefore, no direct loss related to Facility construction or operation is anticipated.

Assessment of indirect loss is directly related to potential noise, traffic, and visual impacts. In response to OARs 345-021-0010(1)(t)(B)(ii) through (iv), significant adverse impacts related to noise, traffic, and visibility of structures from Facility construction and operation are not anticipated at the important recreational opportunities identified in Section T.2.1. The Applicant will demonstrate that no indirect loss related to Facility construction or operation is anticipated.

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

**Response:** No significant potential adverse impacts related to noise are anticipated; this will be confirmed during final analysis.

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

**Response:** No significant potential adverse impacts related to traffic are anticipated; this will be confirmed during final analysis.

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

**Response:** Significant adverse impacts on views from the important recreational resources are not anticipated; this will be confirmed during final analysis.

#### **T.4 MITIGATION MEASURES**

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

**Response:** No significant adverse impacts on important recreational opportunities are anticipated to result from Facility design, construction, and operation. Therefore, no measures are anticipated to avoid, reduce, or otherwise mitigate Facility impacts.

#### **T.5 MAP OF ANALYSIS AREA**

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

**Response:** Figure T-1 shows the analysis area for recreational opportunities and the potentially important recreational opportunities identified pursuant to OAR 345-021-0010(1)(t)(A).

## T.6 MONITORING PROGRAM

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

**Response:** Because no significant impacts are expected on important recreational opportunities, no monitoring program is anticipated.

## T.7 SUMMARY

The Facility is anticipated to have no significant adverse impacts on any important recreational opportunities within the analysis area. The Facility will be designed, constructed, and operated to have no significant adverse impact on important recreational opportunities in the analysis area, in accordance with OAR 345-022-0100(1).

## T.8 REFERENCES

Bureau of Land Management (BLM). 2003. *Lakeview Resource Management Plan and Record of Decision*. November 2003. Accessed June 2022.

[https://www.blm.gov/or/districts/lakeview/plans/files/Lakeview\\_RMP\\_Text\\_Appendices.pdf](https://www.blm.gov/or/districts/lakeview/plans/files/Lakeview_RMP_Text_Appendices.pdf).

Bureau of Land Management (BLM). 2022a. *Lost Forest/Dunes/Fossil ACEC*. Accessed June 2022.

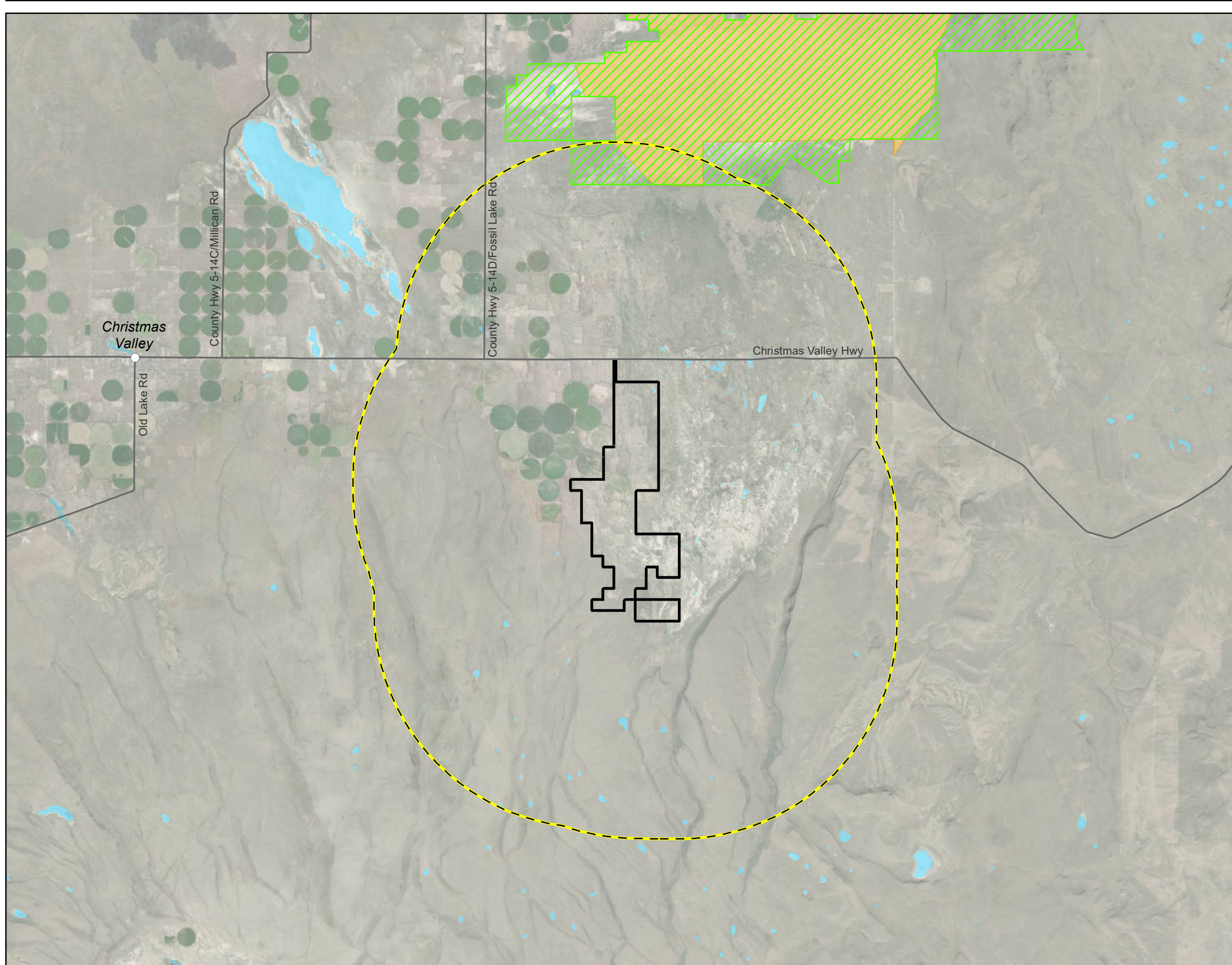
<https://www.blm.gov/visit/lost-forestdunesfossil-acec>.

Bureau of Land Management (BLM). 2022b. *Sand Dunes Wilderness Study Area*. Accessed June 2022.

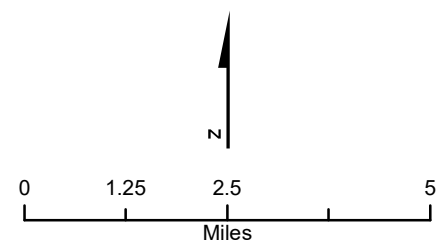
<https://www.blm.gov/programs/national-conservation-lands/oregon-washington/sand-dunes-wsa>.



Figure



- Legend**
- Facility Site Boundary
  - Archway Site Recreational Opportunities Analysis Area (5 miles)
  - Waterbody
- Recreational Opportunities**
- Lost Forest-Sand Dunes-Fossil Lake ACEC
  - Sand Dunes Wilderness Study Area



**Figure T-1**  
**Recreational Opportunities within 5 Miles**  
**of the Facility Site Boundary**  
 Application for Site Certificate  
 Archway Solar Energy Facility  
 Lake County, Oregon