

Exhibit T

Recreational Opportunities

**West End Solar Project
September 2022**

**Prepared for
EE West End Solar LLC**

Prepared by



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

Acronyms and Abbreviations

Applicant	EE West End Solar LLC
BLM	U.S. Bureau of Land Management
GIS	Geographic Information System
I-84	Interstate
NWR	National Wildlife Refuge
OAR	Oregon Administrative Rule
ODFW	Oregon Department of Fish and Wildlife
ONHT	Oregon National Historic Trail
OPRD	Oregon Parks and Recreation Department
OR-395	Oregon Route
Project	West End Solar Project
USFWS	U.S. Fish and Wildlife Service
ZVI	zone of visual influence

1.0 Introduction

EE West End Solar LLC (Applicant), a subsidiary of Eurus Energy America Corporation, proposes to construct the West End Solar Project (Project), a solar energy generation facility and related or supporting facilities in Umatilla County, Oregon. Exhibit T contains information pertaining to potential adverse impacts of construction and operation of the proposed Project on important recreational opportunities, as required to meet the submittal requirements in Oregon Administrative Rules (OAR) 345-021-0010(t) paragraphs (A) through (E).

This exhibit demonstrates that the Project can comply with OAR 345-022-0100:

OAR 345-022-0100

(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; and*
- (e) Irreplaceability or irretrievability of the opportunity.*

The Analysis Area for recreational opportunities is defined as the area within the Site Boundary and 5 miles from it. The Site Boundary is defined in detail in Exhibits B and C. The boundary of the recreational opportunities Analysis Area is shown on Figure T-1.

2.0 Recreational Opportunities in the Analysis Area – OAR 345-021-0010(1)(t)(A)(D)

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:

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.

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

2.1 Inventory Methods

The Applicant identified recreational opportunities within the Analysis Area through the collection and review of existing published and unpublished information that was available from desktop research sources that are commonly used for recreation inventory efforts. Key types of resources included:

- Published maps with geographic coverage applicable to the Analysis Area. Specific sources included U.S. Geological Survey 1:100,000-scale and 1:24,000-scale topographic maps, and maps published by federal and state land management agencies, primarily the U.S. Bureau of Land Management (BLM);
- Geographic Information System (GIS) files documenting recreational resources obtained from key recreation provider agencies, including BLM, the National Park Service, the Oregon Department of Parks and Recreation (OPRD), and the Oregon Department of Fish and Wildlife (ODFW);
- Land management agency planning documents;
- Comprehensive plans, park and recreation plans, and individual park master plans prepared by OPRD and by counties and municipal governments within the Analysis Area;
- Internet sites maintained by recreation provider agencies, including OPRD and county and city park departments; 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.

2.2 Summary of Recreational Opportunities

Recreational activities occurring within the Analysis Area include hiking/walking, fishing, boating, camping, bicycling, photography, game and bird hunting, and sightseeing. These activities also occur in numerous locations outside the Analysis Area, and therefore some of the recreational opportunities identified within the Analysis Area do not rise to the level of uniqueness or irreplaceability that is required by OAR 345-022-0100(1).

There are 23 identified recreational opportunities within the Analysis Area. Most of the opportunities are provided by the cities of Echo, Hermiston, and Stanfield; they include 18 parks, a public disc golf course, a hiking trail, and a golf course open to the public.

Public hunting is offered at the Cold Springs National Wildlife Refuge (NWR) in addition to other recreational activities. BLM owns Hermiston Butte, adjacent to Butte Park (City of Hermiston), which offers hiking opportunities.

Inventoried recreational opportunities within the Analysis Area are described below in order of their management or ownership status (federal, state, local and private). Attachment T-1 (see Section 2.3.1) provides a summary of each identified recreational opportunity, and an assessment

of the importance of each opportunity. Figure T-1 shows the location of the recreational opportunities identified in the Analysis Area.

2.2.1 Federal

Lands owned or managed by federal agencies within the Analysis Area includes the Cold Springs NWR (U.S. Fish and Wildlife Service; USFWS) and the Hermiston Butte (BLM). The Cold Springs NWR is also recognized by ODFW as an Access and Hunting Site (ODFW 2018). The NWR system conserves some of the country's most iconic ecosystems in both terrestrial and aquatic environments. The Cold Springs NWR in particular is 3,102 acres of waterfowl/native bird habitat and was one of the first refuges established in the western United States, in 1909 (USFS 2015).

Public BLM land is plentiful in Oregon and Washington, offering an abundance of recreation opportunities (BLM 2021). Aside from Hermiston Butte, there are two other BLM sites within the Analysis Area, although they do not currently offer any recreational opportunities; therefore, they are not discussed further. There are no other federal lands or lands managed by a federal agency within the Analysis Area.

The attributes of these federal recreational opportunities are summarized in Attachment T-1. These recreational opportunities primarily serve local residents of communities such as Echo, Hermiston, Stanfield, and Umatilla.

2.2.2 State

There are no lands owned or managed by the State of Oregon within the Analysis Area except for state highway rights-of-way. No state parks or designated scenic byways are located within the Analysis Area (OPRD 2021, Oregon.gov 2019). A single ODFW Access and Hunting Program site was identified within the Analysis Area at the Cold Springs NWR (ODFW 2018).

2.2.3 Local Governments and Special Districts

Local government resources tend to be smaller-scale parks with an emphasis on day-use activities and typically serve more localized user populations. The cities of Echo, Hermiston, and Stanfield are the only local government entities that provide recreational opportunities within the Analysis Area. No county parks are within the Analysis Area.

The recreational opportunities provided by the City of Echo (2020) include Fort Henrietta Park, F.T. George Park, and the Echo Hills Golf Club. The City of Hermiston offers thirteen recreational attractions, a majority being municipal parks, within the Analysis Area (Hermiston Oregon 2021). Lastly, the Analysis Area includes all of the City of Stanfield's parks: Stanfield Heights Park, Nathan Bard Memorial Community Park (Bard Park), Coe Park, Stockard Park, and Rauch Park (City of Stanfield 2020). The attributes of these municipal opportunities are summarized in Attachment T-1. These recreational opportunities are all small and primarily serve the residents of Echo, Hermiston, and Stanfield.

2.2.4 Private

No privately-owned recreational opportunities were identified within the Analysis Area.

2.3 Important Recreational Opportunities

2.3.1 Importance Criteria

Recreational opportunities identified within the Analysis Area were evaluated for importance based on the criteria outlined in OAR 345-022-0100. Specifically, the importance of each recreational opportunity was rated based on:

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

The importance of the identified recreational opportunities was determined from the assessment of available information specific to each criterion, as well as a qualitative balancing of the attributes for all five criteria for a given resource. Specific considerations used to characterize an opportunity relative to the five importance criteria are:

1. There can be distinct, identifiable differences among the types of special management designations that apply to lands within an Analysis Area and their implications for resource protection. Some 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.
2. Qualitative ratings of High, Moderate, and Low were used as proxy measures for the level of demand for a specific recreation opportunity.
3. Identification of characteristics that might be considered outstanding or unusual qualities for a given opportunity is a highly subjective task because of wide variation in values, tastes, and perceptions among the recreational public. The standard does not specify what qualities would define an opportunity as outstanding or unusual, nor does it 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.

4. Qualitative ratings of Rare, Uncommon, and Common were used to address the criterion based on the rareness of an opportunity. Consideration of these rareness attributes was based on the approximate set of comparable opportunities (and the geographic scale appropriate to each type of opportunity) available within the general region surrounding the Project. Local parks are provided by several municipalities within the region, although the City of Echo, City of Hermiston, and City of Stanfield are the only local governments providing opportunities within the Analysis Area.
5. 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 recreated in the same place or at another location (such as the Cold Springs NWR and BLM Hermiston Butte) can reasonably be considered Irreplaceable. By contrast, most opportunities that are based on constructed recreation facilities or infrastructure (such as typical campgrounds or municipal parks) could feasibly be replaced and were considered Replaceable.

The overall assessment of importance for each recreational opportunity identified was conducted on a case-by-case basis. For example, it is conceivable that a resource would have a special management designation and high use, but still be a common and replaceable opportunity without unique or outstanding qualities; in that instance, a determination that the opportunity was not important would be justifiable. Alternatively, an opportunity might have little or no management protection and low evident demand, but still be considered important because it was rare and/or irreplaceable. Attachment T-1 summarizes the importance assessment for all identified recreation resources in the Analysis Area.

2.3.2 Resource Descriptions and Importance Assessment

Based on the importance criteria described above and summarized in Attachment T-1, four of the 23 identified recreation resources within the Analysis Area -Cold Springs NWR, BLM Hermiston Butte, Fort Henrietta Park and Campground (Echo), and Butte Park (Hermiston) - have been determined to be important for the purposes of this application. The approach and results for the importance assessment are summarized below.

2.3.2.1 Federal

Cold Springs National Wildlife Refuge

The Cold Springs NWR is a 3,102-acre federal waterfowl/native bird habitat preserve located southeast of Hermiston (USFWS 2015). It is the only NWR and ODFW Access and Hunting Site within the Analysis Area (ODFW 2018), providing protection for outstanding wildlife habitat. The NWR also boasts hiking, biking, and horseback riding opportunities, wildlife viewing and photography, and fishing (USFWS 2015). Based on the ecological interest and the mix of individual opportunities, the NWR is considered an uncommon resource; the recreational opportunities are relatively common in the region, but may not offer the same quality of sights and habitat as

provided by this NWR. The level of demand is assumed to be low to moderate, because the local population is small, the NWR capacity is large, and the NWR is not located on a high-volume travel route nor near larger population centers. No surveys have ever been completed to determine the level of usage, but the USFWS states that the use is low and the NWR is typically used by residents of local communities (USFWS 2015). The resources and characteristics of the NWR are irreplaceable due to it being a geographic/static recreational resource, and unique to the community. Therefore, though the NWR has low to moderate demand, because of its uncommon nature and irreplaceability the Cold Springs NWR is considered to meet the criteria for an important recreation resource.

BLM Hermiston Butte

BLM Hermiston Butte is a small, publicly accessible recreation area that primarily serves the local population of Hermiston (AllTrails 2021, BLM 2021). The Butte is unusual in that it is the sole butte/raised geographic attraction providing elevated views in the community of Hermiston, as well as the Analysis Area. It provides 0.8 miles of hiking trails and an automobile access route to its summit (AllTrails 2021, Google Earth 2021). Based on the geographic interest and the mix of individual opportunities, the Butte is considered an uncommon resource. The level of demand is assumed to be low to moderate, because the local population is small, the Butte capacity is large, and the Butte is not located on a high-volume travel route nor near larger population centers. The resources and characteristics of the Butte are irreplaceable due to it being a geographic/static recreational resource, and unique to the community. Therefore, though the Butte has low to moderate demand, because of its uncommon nature and irreplaceability Hermiston Butte is considered to meet the criteria for an important recreation resource.

2.3.2.2 City of Stanfield

Stanfield Heights Park

Stanfield Heights Park is a small, undeveloped facility within a developed community that in most respects offers less than other small, municipal parks that serve a local population (Google Earth 2021). Due to the undeveloped nature, this park does not have characteristics that are notable or outstanding. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors, and the lack of outstanding characteristics, Stanfield Heights Park is not considered to meet the criteria for an important recreation resource.

Nathan Bard Memorial Community Park (Bard Park)

Nathan Bard Memorial Community Park (often referred to as Bard Park) is a small facility located within a developed community, and it is typical in many respects of other small, municipal parks that serve a local population. The park does have some characteristics that are notable, but not outstanding, including general park and sports amenities such as a T-ball and soccer fields, a

basketball court, and horseshoe pits, as well as a gazebo area. However, the park does have some unusual qualities, including the fact that it is used to host the Stanfield 4th of July Celebration every year. Based on the tradition interest and the mix of individual opportunities, the park is considered an uncommon resource. The level of demand is assumed to be low, because the local population is small, the facility capacity is small, and the park is not located on a high-volume travel route. The resources and characteristics of the park are generally replaceable. Therefore, Bard Park is not considered to meet the criteria for an important recreation resource.

Stockard Field

Stockard Field is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (City of Stanfield 2020). The park does have some characteristics that are notable but not outstanding, including sports amenities such as little league baseball fields. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Stockard Field is not considered to meet the criteria for an important recreation resource.

Rauch Park

Rauch Park is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (City of Stanfield 2020). The park does have some characteristics that are notable but not outstanding, including general park amenities and a landscaped space. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Rauch Park is not considered to meet the criteria for an important recreation resource.

Coe Park

Coe Park is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (City of Stanfield 2020). The park does have some characteristics that are notable but not outstanding, including general park and sports amenities such as a volleyball court, as well as a gazebo area. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Coe Park is not considered to meet the criteria for an important recreation resource.

2.3.2.3 *City of Echo*

Echo Hills Golf Club

The 50-acre, 9-hole Echo Hills Golf Club is a public, municipal course located on the eastern edge of the community of Echo (City of Echo 2020). The level of demand is assumed to be low, because the local population is small and the course is not near larger population centers. The course is rated as of average difficulty, and available information about the course does not reference outstanding or unusual qualities. Although there are no other public golf courses within the Analysis Area, the surrounding region includes golf courses within multiple communities such as Pendleton, Boardman, Umatilla, and Heppner. Therefore, this resource is considered common, and it is replaceable. Based on consideration of the attributes relative to the defined set of importance criteria, the Echo Hills Golf Club is not considered to meet the criteria for an important recreation resource.

Fort Henrietta Park and Campground

Fort Henrietta Park is a small facility located within a developed community, and it is typical in many respects of other small, municipal parks that serve a local population. However, the park does have some unusual qualities, including its location on and access to the Umatilla River, location at a noted Oregon National Historic Trail (ONHT) campsite and river crossing, a replica of a frontier-era blockhouse, and the inclusion of camping within the park (City of Echo 2020). Based on the historic interest and the mix of individual opportunities, specifically including the river access, the park is considered an uncommon resource. The level of demand is assumed to be low, because the local population is small, the facility capacity is small, and the park is not located on a high-volume travel route. The resources and characteristics of the park are generally replaceable, except for the historical link to the ONHT crossing (i.e., its function as a campsite and river crossing for Oregon Trail emigrants). Though the park has low demand and is partially replaceable, because of its uncommon access to the Umatilla River and irreplaceable historical connection to the ONHT, Fort Henrietta Park is considered to meet the criteria for an important recreation resource.

F.T. George Park

F. T. George Park (often referred to as George Park) is also a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (City of Echo 2020). The park does have some characteristics that are notable but not outstanding, including its use for community events and the apparent quality of the landscaping. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small, although use for community events may raise the demand level to moderate. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, George Park is not considered to meet the criteria for an important recreation resource.

2.3.2.4 *City of Hermiston*

Highland Park

Highland Park is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park amenities. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Highland Park is not considered to meet the criteria for an important recreation resource.

Newport Park

Newport Park is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park and sports amenities such as a baseball field and basketball court. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Newport Park is not considered to meet the criteria for an important recreation resource.

Hodge Park

Hodge Park is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park, pet, and sports amenities such as a sand volleyball area. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small, although use of the reservable picnic shelter may raise the demand level to moderate. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Hodge Park is not considered to meet the criteria for an important recreation resource.

McKenzie Park

McKenzie Park is a small facility located within a developed community, and it is typical in many respects of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park, pet, and sports amenities such as a skatepark. However, the park does have some unusual qualities, including that it is the sole skatepark in the community and contains an interpretive panel site. Based on the educational interest and the mix of individual opportunities, the park is considered an uncommon resource. The level of demand is assumed to be low, because the local

population is small, the facility capacity is small, and the park is not located on a high-volume travel route, although use of the reservable picnic shelter may raise the demand level to moderate. The resources and characteristics of the park are generally replaceable. Therefore, McKenzie Park is not considered to meet the criteria for an important recreation resource.

Sunset Park

Sunset Park is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park, pet, and sports amenities such as a basketball court. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Sunset Park is not considered to meet the criteria for an important recreation resource.

Greenwood Park

Greenwood Park is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park amenities. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Greenwood Park is not considered to meet the criteria for an important recreation resource.

Belt Park

Belt Park is a small facility located within a developed community, and it is typical in many respects of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park amenities. However, the park does have some unusual qualities, including an attractive arboretum and notable landscaping. Based on the aesthetic interest and the mix of individual opportunities, the park is considered an uncommon resource. The level of demand is assumed to be low, because the local population is small, the facility capacity is small, and the park is not located on a high-volume travel route. The resources and characteristics of the park are generally replaceable. Therefore, Belt Park is not considered to meet the criteria for an important recreation resource.

Butte Park

Butte Park is a large facility located within a developed community, and it is typical in many respects of various small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park, pet, and sports amenities such as a football field, four-lit soccer fields. However, the park does have some unusual qualities, including that it is the sole dog park and spray park in the community;

home to the Funland Playground, one of the largest playground in the Northwest (opening Spring 2021); has interpretive panels; and has direct access to BLM's Hermiston Butte. Based on the educational and locational interest and the mix of individual opportunities, the park is considered an uncommon resource. The level of demand is assumed to be low to moderate, because the local population is small, the site is large, and the park is not located on a high-volume travel route, although use of the reservable picnic shelter may raise the demand level to moderate. The resources and characteristics of the park are generally replaceable, except for the unique attractions and location adjacent to Hermiston Butte. Though the park has low to moderate demand and is partially replaceable, because of its uncommon features and access to Hermiston Butte, Butte Park is considered to meet the criteria for an important recreation resource.

Victory Square Park

Victory Square Park is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park, pet, and sports amenities such as a basketball court and volleyball court. The level of demand for typical park use is assumed to be low, because the local population and the facility capacity are both small, although use of the reservable picnic shelter may raise the demand level to moderate. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Victory Square Park is not considered to meet the criteria for an important recreation resource.

Theater Sports Park

Theater Sports Park is a small facility located within a developed community, and it is typical in many respects of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park, pet, and sports amenities such as a football field, soccer field, and multiple softball fields. However, the park does have some unusual qualities, including the fact that it used to host youth sports and is also the home to the Hermiston City Softball League. Based on the tradition interest and the mix of individual opportunities, the park is considered an uncommon resource. The level of demand is assumed to be low, because the local population is small, the facility capacity is small, and the park is not located on a high-volume travel route, although use of the softball fields for competitions may raise the demand level to moderate. The resources and characteristics of the park are generally replaceable. Therefore, Theater Sports Park is not considered to meet the criteria for an important recreation resource.

Harrison Park

Harrison Park is a small facility within a developed community that in most respects is typical of other small, municipal parks that serve a local population (Hermiston Oregon 2021). The park does have some characteristics that are notable but not outstanding, including general park and pet amenities. The level of demand for typical park use is assumed to be low, because the local

population and the facility capacity are both small. The park is considered a common resource, and it is replaceable. Based on the demand and replaceability factors and the lack of outstanding characteristics, Harrison Park is not considered to meet the criteria for an important recreation resource.

Hermiston Desert Disc Golf Course

The 18-hole Hermiston Desert Disc Golf Course is a public, municipal course located on the west side of the community of Hermiston (Hermiston Oregon 2021). The level of demand is assumed to be low, because the local population is small and the course is not near larger population centers. The course is rated as of average difficulty, and available information about the course does not reference outstanding or unusual qualities. Although there are no other public disc golf courses within the Analysis Area, the surrounding region includes a disc golf course in the community of Pendleton. Therefore, this resource is considered common, and it is replaceable. Based on consideration of the attributes relative to the defined set of importance criteria, the Hermiston Desert Disc Golf Course is not considered to meet the criteria for an important recreation resource.

Oxbow Trail

The Oxbow Trail is a public, municipal hiking trail on the west side of the community of Hermiston (Hermiston Oregon 2021). The trail does have some unusual qualities, including the fact that it is pet-friendly and interconnects with multiple community attractions such as the Hermiston Desert Disc Golf Course, Harrison Park, Riverfront Park, and Highland Trail, creating a five-mile loop. Additionally, interpretive panels, a doggy station, and a gazebo are located along the trail. Based on the connectivity, educational interest and the mix of individual opportunities, the trail is considered an uncommon resource. The level of demand is assumed to be low, because the local population is small and the trail is not near larger population centers. The resources and characteristics of the trail are generally replaceable. Therefore, the Oxbow Trail is not considered to meet the criteria for an important recreation resource.

3.0 Impact Assessment – OAR 345-021-0010(1)(t)(B)

The Applicant assessed recreational opportunities within the Analysis Area to determine whether any of the inventoried resources met the criteria for identification as important recreational resources. As documented in Section 2.3, the Applicant concluded that five of the inventoried resources should be classified as an important recreational opportunity: Cold Springs NWR, BLM Hermiston Butte, Fort Henrietta Park and Campground (Echo), and Butte Park (Hermiston). The following sections evaluate the Project's potential impacts to this important recreational opportunity.

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:

3.1 Direct or Indirect Loss of Recreational Opportunities – OAR 345-021-0010(1)(t)(B)(i)

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

The Cold Springs NWR, BLM Hermiston Butte, Fort Henrietta Park and Campground, and Butte Park are located approximately 2.4, 4.2, 4.9, and 4.1 miles, respectively, from the Site Boundary. As all construction and operation activities for the Project will take place within the Site Boundary, the Project will not result in a direct loss of these recreation opportunities. Because the Project will not displace or add any recreation opportunities in the region that could affect the use of the Cold Springs NWR, BLM Hermiston Butte, Fort Henrietta Park and Campground, or Butte Park, and given the lack of significant adverse impacts due to noise, traffic, or visual changes, as discussed below, the Project will not result in an indirect loss of these recreation opportunities.

3.2 Noise Impacts – OAR 345-021-0010(1)(t)(B)(ii)

(ii) Noise resulting from facility construction or operation.

Exhibit Y provides an assessment of the existing acoustical environment and anticipated Project sound levels; the methodology for noise modeling is discussed in detail in that exhibit. Construction activities associated with the Project have the potential for localized noise on a temporary basis as construction activities progress through certain locations within the Site Boundary. Based on sound levels of the anticipated equipment for Project construction, and given the closest recreational resource is over 2 miles away, construction noise will not likely be discernible from background noise levels at any protected area.

There will be no significant operational noise from the solar modules themselves. However, there will be some limited noise from associated facilities, including cooling equipment associated with the energy storage system and electrical equipment. Based on the results of acoustic modeling, as detailed in Exhibit Y, operational noise will attenuate to a level indistinguishable from the background noise level before reaching any of the recreational resources. All recreational resources are located more than 2 miles from the Site Boundary, where noise from the Project will be indistinguishable from the background noise level. Therefore, no significant noise impacts are expected from construction or operation.

3.3 Traffic Impacts – OAR 345-021-0010(1)(t)(B)(iii)

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

Most of the local roads leading to the Cold Springs NWR, BLM Hermiston Butte, Fort Henrietta Park and Campground, and Butte Park are not part of the primary transportation routes for the Project (see Exhibit U). Project-related traffic on U.S. Highway 395 (US-395) just north of Interstate 84 (I-84) will not have any significant, adverse impact on its level of service, as evaluated in detail in Exhibit U. The recreational resources in Hermiston (Hermiston Butte and Butte Park), could experience traffic impacts if visitors take US-395 to reach these destinations. However, there are

other access routes that can be utilized to access these resources including Oregon Route 207 (OR-207); OR-207 is a more direct route than US-395 to these destinations. Cold Springs NWR and Fort Henrietta Park and Campground will likely be accessed via other more direct routes besides the Project's primary transportation routes. The most direct routes to the Cold Springs NWR are I-82 to Westland Road and Highland Avenue coming from western Oregon, County Road 1137 to Stanfield Loop Road, or OR-37 coming from Eastern Oregon. The most direct route to Fort Henrietta Park and Campground regardless of the direction origin is south off I-84 onto Thielsen Road.

The potential and occasional use of local roads by the Project workforce to access either the Project or visit the recreational resources will not noticeably increase traffic on those routes. Construction will inherently be intermittent and temporary in nature; operational activities will not generate amounts of traffic that could adversely impact recreational resources. Traffic best management practices (as outlined in Exhibit U) will be implemented as appropriate. For these reasons, and as the Project overall is not expected to have a significant impact on traffic per Exhibit U, Project traffic will not have an adverse impact on the Cold Springs NWR, BLM Hermiston Butte, Fort Henrietta Park and Campground, and Butte Park.

3.4 Visual Impacts – OAR 345-021-0010(1)(t)(B)(iv)

(iv) Visual impacts of facility structures or plumes.

The potential for adverse visual impacts on important recreational opportunities is based primarily on the expected visibility of the constructed features of the Project. The Project will not generate emissions plumes; therefore, no visual impacts from plumes are expected. Likewise, solar modules are treated with an antiglare coating that nearly eliminates the reflection of sunlight off the module face; therefore, glare is not considered a potential impact on distant protected areas (see Exhibit R for additional glare discussion).

The Applicant conducted a zone of visual influence (ZVI) analysis to determine if the Project could be seen from important recreational opportunities within the Analysis Area (Figure T-2). The ZVI analysis methodology and overall visual impact assessment approach were the same for important recreational opportunities as for protected and scenic resources; additional details are provided in Exhibits L and R, and not repeated in this exhibit.

Based on the ZVI analysis, of the four important recreation opportunities in the Analysis Area that have been evaluated, the Project will not be visible at two of these opportunities due to distance and terrain (Fort Henrietta Park and Campground and Butte Park; Figure T-2). Project visibility for the remaining two important recreational opportunities (the Cold Springs NWR and BLM Hermiston Butte) is as follows:

- For the **Cold Springs NWR** (approximately 2.4 miles from the Site Boundary), a majority of the NWR will not have views of the Project, which at the base is approximately 100 feet lower than the Project. However, based on the viewshed analyses, there could be limited views of the solar arrays and substation from the central and northeastern portions of the NWR (Figure T-2). Due to the viewing distance and the degree of existing landscape

modification present in the Analysis Area, the Project solar arrays, substation and other collocated facilities—at most—will create weak, additional contrast within the current visual context, and that contrast will be seen by few or no viewers based on low to moderate demand. Note that based on the viewing distance, the low profile of the solar arrays, topography and vegetation, and the existing built environment, it is not anticipated that the solar arrays will be noticed by recreationists using the NWR.

- For **BLM Hermiston Butte** (4.2 miles from the Site Boundary), a majority of the Butte will not have views of the Project, which at the base is approximately 200 feet lower than the Project. However, at the summit, there will be an approximate 70-foot difference in elevation between the Butte and the Project, which, based on the viewshed analyses, could generate limited views of the solar arrays (Figure T-2 and Exhibit R). Based on the viewing distance, the low profile of the solar arrays, topography and vegetation, and the existing built environment, it is not anticipated that the solar arrays will be noticed by recreationists using the Butte. Therefore, the adverse visual impacts from the Project on the BLM Hermiston Butte in the Analysis Area will not be significant.

4.0 Minimization and Mitigation Measures – OAR 345-021-0010(1)(t)(C)

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

As described Section 3, the Project will have no significant, direct, adverse impact on any important recreational opportunity. Consequently, no mitigation measures are proposed.

5.0 Map – OAR 345-021-0010(1)(t)(D)

OAR 345-021-0010(1)(t)(D)(D) A map of the Analysis Area showing the locations of important recreational opportunities identified in (A);

Figure T-1 provides a map of the Analysis Area showing locations of recreational opportunities. Four of the identified recreational opportunities meet the criteria for importance under the standard, as described and evaluated in this exhibit.

6.0 Monitoring Program – OAR 345-021-0010(1)(t)

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

Because construction and operation of the Project 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 Conclusion

The information provided above demonstrates that the design, construction, and operation of the Project will not result in significant adverse impacts to recreational opportunities and therefore complies with the recreational standard under OAR 345-022-0100.

8.0 References

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Figures

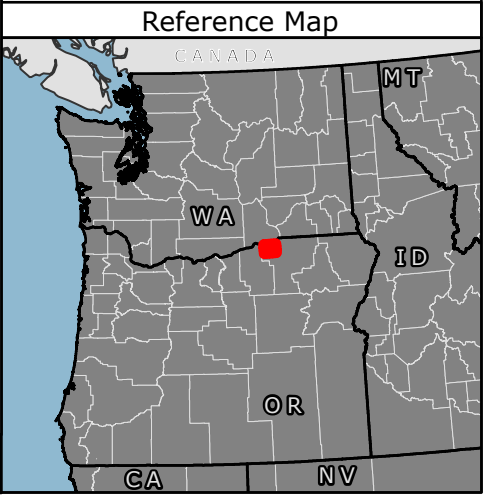
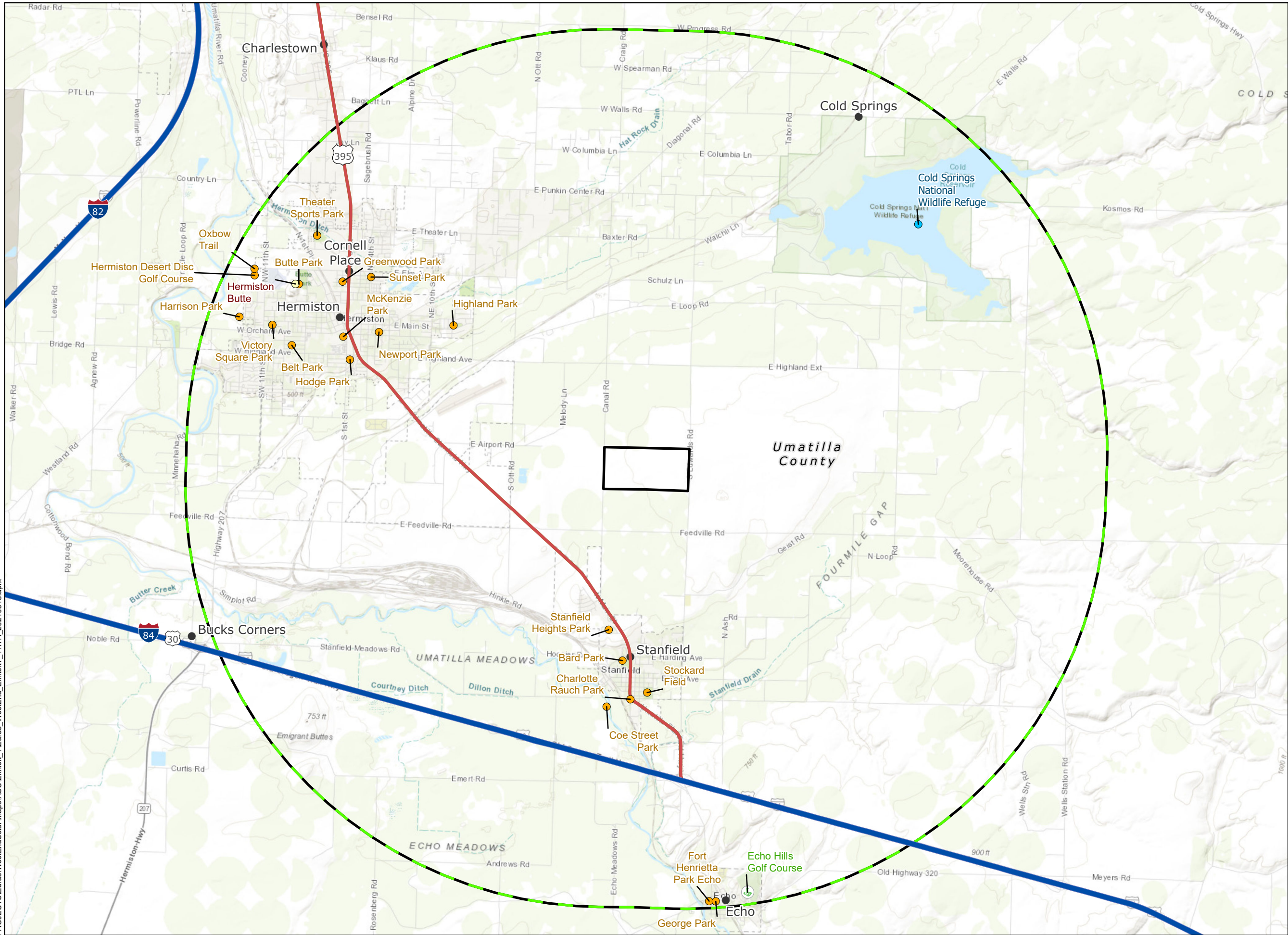
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West End Solar Project

Figure T-1 Recreational Opportunities

UMATILLA COUNTY, OR

-  Proposed Site Boundary
-  Analysis Area (5-mile Buffer)
-  Golf Course
-  Bureau of Land Management
-  US Department of Fish and Wildlife
-  City, County, and State Parks
-  City/Town
-  Interstate Highway
-  US Highway
-  County Boundary















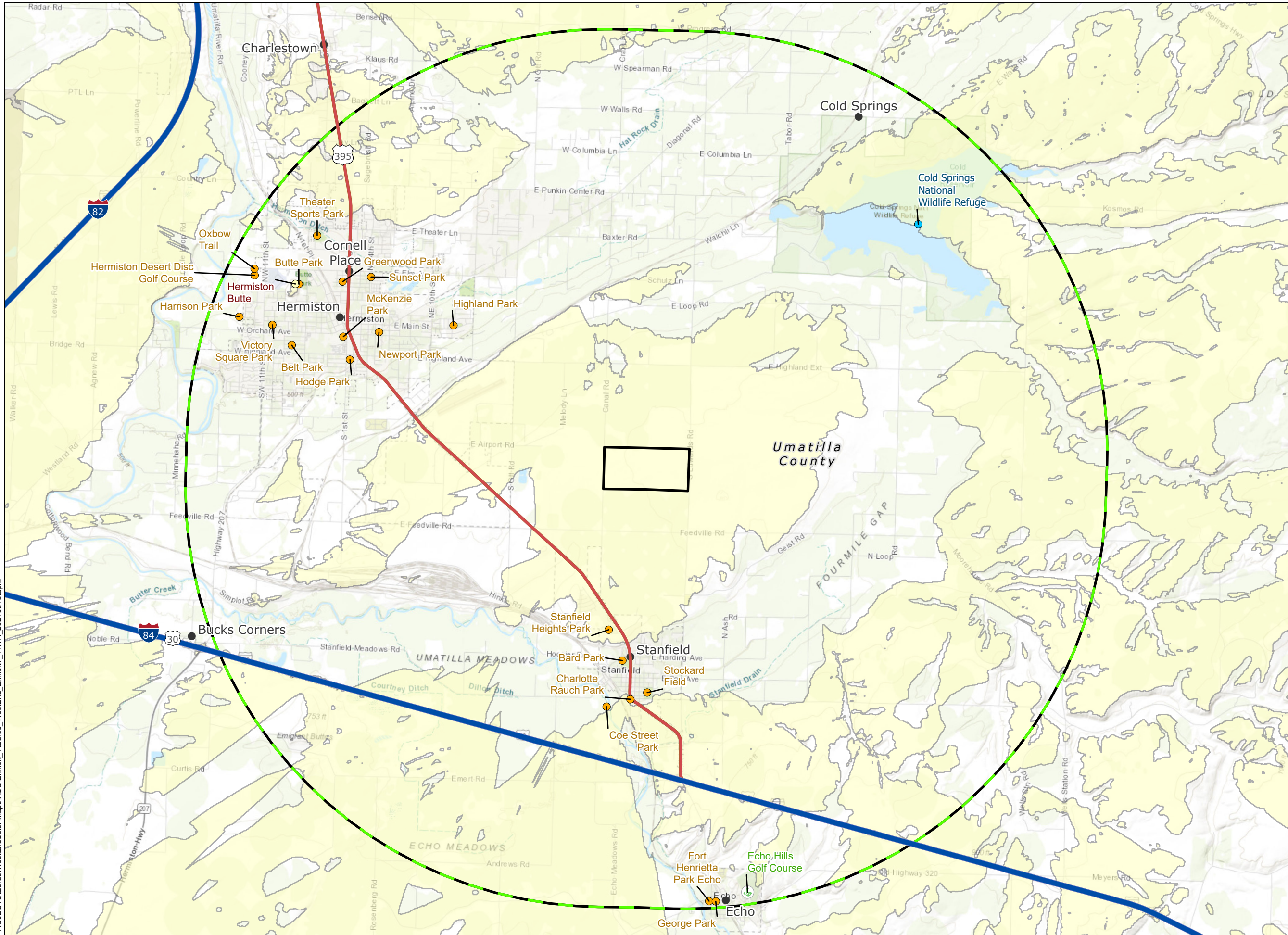
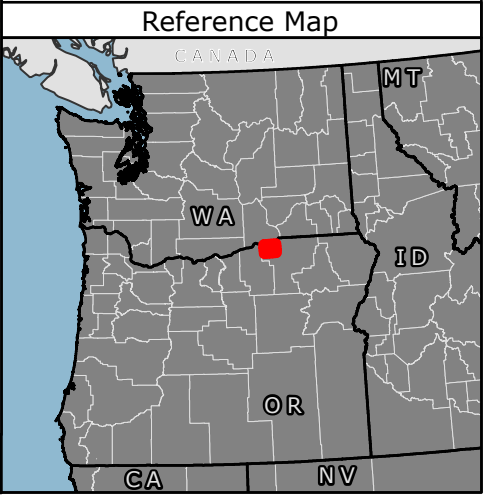
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West End Solar Project

Figure T-2 Recreational Opportunities with ZVI

UMATILLA COUNTY, OR

-  Proposed Site Boundary
-  Analysis Area (5-mile Buffer)
-  Golf Course
-  Bureau of Land Management
-  US Department of Fish and Wildlife
-  City, County, and State Parks
-  Interstate Highway
-  US Highway
-  City/Town
-  County Boundary
- Viewshed Results**
-  Not Visible
-  Solar Facility Potentially Visible



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

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Recreational Opportunity	Responsible Entity	Distance from Site Boundary (miles)	Description	Importance Factors					Important Recreation Resource?
				Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
Federal									
Cold Springs National Wildlife Refuge (NWR)	U.S. Fish and Wildlife Service/Oregon Department of Fish and Wildlife (hunting access)	2.4	NWR boasting hiking, biking, and horseback riding opportunities, wildlife viewing and photography, fishing and hunting. Identified as an Oregon Department of Fish and Wildlife Access and Hunting site.	NWR	Low or Moderate	Protected unique wildlife habitat and sole ODFW Access and Hunting Site in the Analysis Area.	Uncommon (unique habitat/hunting opportunities) Only NWR within the Analysis Area Recreational opportunities are relatively common in the region but may not offer the same quality of sights and habitat.	Irreplaceable	Yes
Bureau of Land Management (BLM) Hermiston Butte	BLM	4.2	Small butte west of Hermiston boasting 0.8 miles of hiking trails and an automobile access route.	BLM recreation area	Low or Moderate	Sole butte/raised geographic attraction in Hermiston.	Uncommon (unique geographic formation)	Irreplaceable	Yes
State									
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Local									
Stanfield Heights Park	City of Stanfield	1.7	Small, undeveloped park.	Municipal park	Low	Undeveloped park, no attractions.	Common (one of several municipal parks within the region)	Replaceable	No
Nathan Bard Memorial Community Park (Bard Park)	City of Stanfield	2.0	Small, municipal park with T-ball and soccer fields, a basketball court, playground, gazebos with picnic benches, and horseshoe pits.	Municipal park	Low	Developed park with community and sports attractions, facilities, and services in an urbanized community. Hosts the Stanfield 4 th of July Celebration every year. Notable gazebo area.	Uncommon resource for a small city (large, community attraction site)	Replaceable	No
Stockard Field	City of Stanfield	2.4	Small, municipal park with three little league baseball field.	Municipal park	Low	Developed park with sports attractions, facilities, and services in an urbanized community.	Common (one of several municipal parks within the region)	Replaceable	No
Rauch Park	City of Stanfield	2.5	Small, municipal park with grass open space.	Municipal park	Low	Developed park with landscaped space in an urbanized community.	Common (one of several municipal parks within the region)	Replaceable	No

Recreational Opportunity	Responsible Entity	Distance from Site Boundary (miles)	Description	Importance Factors					Important Recreation Resource?
				Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
Coe Park	City of Stanfield	2.6	Small, municipal park with a playground, volleyball court, gazebo with tables and barbeque pits, and ample grass space.	Municipal park	Low	Developed park with community and sports attractions, facilities, and services in an urbanized community. Notable gazebo area.	Common (one of several municipal parks within the region)	Replaceable	No
Echo Hills Golf Course	City of Echo	4.9	Public 9-hole golf course with pro shop, snack bar, driving range, and cart rentals.	Municipal golf course	Low	Public golf course situated on rolling hills overlooking the Umatilla River Valley. Typical of golf courses in small, rural communities.	Common (one of several golf courses within the region)	Replaceable	No
Fort Henrietta Park and Campground	City of Echo	4.9	Public park located on the Umatilla River. A replica blockhouse has been constructed at the site. The park includes a small recreational vehicle (RV) park and campground, a playground, and a skate park.	Municipal park	Low	Public park with RV campground, public access to the Umatilla River, and interpretive panels. Site apparently is part of the ONHT Echo Complex high-potential site identified by the NPS (1999) because it was a campsite and river crossing for the Oregon Trail emigrants. No remnants of the Oregon Trail are located within the park.	Uncommon (interpretive site, one of few public access points along the Umatilla River in the region)	Replaceable park facilities; Irreplaceable connection to ONHT crossing site	Yes
F.T. George Park	City of Echo	4.9	Small, formal municipal park located behind city hall. The landscaped park includes a gazebo, rose garden, pond and waterfall, and picnic facilities. It is available for rental and is the site of many community events.	Municipal park	Low or Moderate	Notable for community event use and diversity of landscaping.	Common (one of several municipal parks within the region)	Replaceable	No
Highland Park	City of Hermiston	2.3	Small, municipal park with grass open space, playground, picnic tables, and walking paths (concrete/asphalt). No reservations necessary.	Municipal park	Low	Developed park with community attractions, facilities, and services in an urbanized community.	Common (one of several municipal parks within the region)	Replaceable	No
Newport Park	City of Hermiston	3.0	Small, city block municipal park with baseball field, grass open space, basketball court, and playground. No reservations necessary.	Municipal park	Low	Developed park with community and sports attractions, facilities, and services in an urbanized community.	Common (one of several municipal parks within the region)	Replaceable	No

Recreational Opportunity	Responsible Entity	Distance from Site Boundary (miles)	Description	Importance Factors					Important Recreation Resource?
				Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
Hodge Park	City of Hermiston	3.2	Small, municipal park with doggy station, grass open space, off-street parking, picnic tables, restrooms, walking paths (concrete/asphalt), drinking fountain, large shade trees, picnic shelter, playground, and sand volleyball. Reservations available for the picnic shelter.	Municipal park	Low or Moderate	Developed park with community, pet, and sports attractions, facilities, and services in an urbanized community. Reservable space available.	Common (one of several municipal parks within the region)	Replaceable	No
McKenzie Park	City of Hermiston	3.4	Small, municipal park with doggy station, interpretive panel, picnic shelter, playground, skatepark, water feature, drinking fountain, large shade trees, picnic tables, restrooms, and walking paths (concrete/asphalt). Reservations available for the picnic shelter.	Municipal park	Low or Moderate	Developed park with community, pet, and sports attractions, facilities, and services in an urbanized community. Reservable space available. Notable for interpretive panel and skatepark.	Uncommon resource for a small city (skatepark, interpretive site)	Replaceable	No
Sunset Park	City of Hermiston	3.5	Small, municipal park with basketball court, grass open space, playground, doggy station, picnic tables, and walking paths (concrete/asphalt) No reservations necessary.	Municipal park	Low	Developed park with community, pet, and sports attractions, facilities, and services in an urbanized community.	Common (one of several municipal parks within the region)	Replaceable	No
Greenwood Park	City of Hermiston	3.7	Small, municipal park with picnic shelter, playground, and picnic tables. No reservations necessary.	Municipal park	Low	Developed park with community attractions, facilities, and services in an urbanized community.	Common (one of several municipal parks within the region)	Replaceable	No
Belt Park	City of Hermiston	3.9	Small, municipal park with community arboretum, picnic shelter, water feature, large shade trees, and an unpaved walking trail. No reservations necessary.	Municipal park	Low	Developed park with community attractions, facilities, and services in an urbanized community. Notable for attractive arboretum and landscaping.	Uncommon resource for a small city (arboretum)	Replaceable	No
Butte Park	City of Hermiston	4.1	Large, municipal park with concession stand, doggy station, electricity, Funland Playground, hiking trails doing up to BLM Hermiston Butte, large picnic shelter, off-street parking, picnic tables, restrooms, Butte Park Spray Park, walking paths (concrete/asphalt), dog park, drinking foundation, football field, grass open space, interpretive panel, large shade trees, picnic shelter, playground, and four lighted soccer fields. Reservations available for the picnic shelter.	Municipal park	Low or Moderate	Sole dog park and spray park in Hermiston. Home to the Funland Playground, one of the largest playgrounds in the Northwest (opening Spring 2021). Site has notable interpretive panel along with lighted-soccer fields and direct access to Hermiston Butte. Reservable space available.	Uncommon resource for a small city (large, community attraction site, interpretive site, dog park, spray park, access to Hermiston Butte)	Replaceable	Yes

Recreational Opportunity	Responsible Entity	Distance from Site Boundary (miles)	Description	Importance Factors					Important Recreation Resource?
				Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
Victory Square Park	City of Hermiston	4.2	Small, municipal park with basketball court, drinking fountain, large shade trees, picnic tables, restrooms, walking paths (concrete/asphalt), doggy station, grass open space, picnic shelter, playground, and sand volleyball court. Reservations available for the picnic shelter.	Municipal park	Low or Moderate	Developed park with community, pet, and sports attractions, facilities, and services in an urbanized community. Reservable space available.	Common (one of several municipal parks within the region)	Replaceable	No
Theater Sports Park	City of Hermiston	4.3	Small, municipal park with doggy station, football field, off-street parking, playground, soccer field, drinking fountain, grass open space, picnic tables, restrooms, and softball fields. No reservations necessary.	Municipal park	Low or Moderate	Developed park with community, pet, and sports attractions, facilities, and services in an urbanized community. Hosts youth sports and is the home to the Hermiston City Softball League.	Uncommon resource for a small city (softball competition location)	Replaceable	No
Harrison Park	City of Hermiston	4.6	Small, municipal park with doggy station, playground, grass open space, and walking paths (concrete/asphalt). No reservations necessary.	Municipal park	Low	Developed park with community and pet attractions, facilities, and services in an urbanized community.	Common (one of several municipal parks within the region)	Replaceable	No
Hermiston Desert Disc Golf Course	City of Hermiston	4.7	Eighteen-hole disc golf course with walking paths (both unpaved and concrete/asphalt).	Municipal disc golf course	Low or Moderate	One of two-disc golf courses in the region.	Uncommon resource for a small city (disc golf course)	Replaceable	No
Oxbow Trail	City of Hermiston	4.7	Grade 1, 3.1 mile lightly trafficked trail. Dog friendly and used for walking and running. Trail connect to the Good Shepherd Health Care campus, Hermiston Desert Disc Golf Course, Harrison Park, Riverfront Park, and Highland trail, creating a 5-mile loop. Interpretive panels with benches line the trail. Also includes doggy station, a gazebo, walking paths (both unpaved and concrete/asphalt), and off-street parking.	Municipal hiking trail	Low	Developed, pet-friendly trail that interconnected multiple attractions within an urbanized community. Educational interpretive panels along trail and notable gazebo area.	Uncommon resource for a small city (interpretive site, interconnected hiking path)	Replaceable	No
Nongovernmental Organizations									
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Private									
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A