

Exhibit T

Recreational Opportunities

**Yellow Rosebush Energy Center
August 2024**

**Prepared for
Yellow Rosebush Energy Center, LLC**

Prepared by



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

Acronyms and Abbreviations

Applicant	Yellow Rosebush Energy Center, LLC
BLM	Bureau of Land Management
Facility	Yellow Rosebush Energy Center
OAR	Oregon Administrative Rules
ODFW	Oregon Department of Fish and Wildlife
ODOT	Oregon Department of Transportation
OPRD	Oregon Parks and Recreation Department
USFS	U.S. Forest Service
USGS	U.S. Geological Survey

1.0 Introduction

Yellow Rosebush Energy Center, LLC (Applicant) seeks to develop the Yellow Rosebush Energy Center (Facility), a solar energy generation facility, battery energy storage system, and related or supporting facilities in Wasco and Sherman counties, Oregon. This Exhibit T was prepared to meet the submittal requirements in Oregon Administrative Rules (OAR) 345-021-0010(1)(t) and the approval standard in OAR 345-022-0100.

2.0 Analysis Area

As defined in the Project Order¹, the Facility's analysis area for recreational opportunities is the area within and extending 2 miles from the site boundary (Figure T-1). The site boundary is defined in detail in Exhibits B and C and is shown on Figure T-1.

3.0 Recreational Opportunities in the Analysis Area – OAR 345-021-0010(1)(t)(A)&(E)

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)(E) A map of the analysis area showing the locations of important recreational opportunities identified in paragraph (A); and

3.1 Inventory Methods

Recreational opportunities within the analysis area were identified through collection and review of existing published and unpublished information available from desktop research sources commonly used for recreation inventory efforts. Key types of information resources investigated for the inventory included:

- Geographic information system files documenting recreational resources obtained from key recreation provider agencies, e.g., the Bureau of Land Management (BLM; BLM 2024a, BLM 2024b), Oregon Department of Fish and Wildlife (ODFW; ODFW 2021), U.S. Forest Service

¹ Oregon Department of Energy, Project Order for Yellow Rosebush Energy Center (January 2024)

(USFS 2024, USFS 2023), U.S. Geological Survey (USGS 2024), and Oregon Parks and Recreation Department (OPRD; OPRD 2018);

- 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 (Sherman County 2007, Wasco County 2008);
- Internet sites maintained by recreation provider agencies, including OPRD, ODFW, Oregon Department of Transportation (ODOT), and county and city park departments (ODFW 2024, ODOT 2019, OPRD 2024a, OPRD 2024b, Sherman County 2024, Wasco County 2022); 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 2023).

3.2 Resource Descriptions

In general, recreation activities in the analysis area may consist of camping, fishing, swimming and various water activities, hiking, horseback riding, and hunting. These activities also occur in numerous locations outside the analysis area, and therefore all 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 is one identified recreational opportunity within the analysis area, the Sage Canyon Outfitters (Attachment T-1, Figure T-1). Recreational opportunities within the analysis area are described below in order of federal, state, local, and private ownership/management.

3.2.1 Federal

The BLM Prineville District manages several parcels within the analysis area, the closest being directly adjacent to the northeastern site boundary of the Facility. None of these parcels contain a designated recreation area nor are they considered to be a recreational resource. There are no other federal lands or lands managed by a federal agency within the analysis area.

3.2.2 State

There is a single parcel owned by the State of Oregon within the analysis area. This parcel does not contain a designated recreation area nor is it considered a recreational resource. Similarly, a portion of the state-managed Oregon Route 216 (OR-216) is within the analysis area, which does not include any associated recreational opportunities. There are no other state lands or lands managed by a state agency within the analysis area.

3.2.3 Local Governments and Special Districts

No county, city, or special district managed recreation opportunities were identified within the analysis area.

3.2.4 Private

There is one privately owned recreational opportunity within the analysis area: the Sage Canyon Outfitters (participating landowner). The Sage Canyon Outfitters is an upland bird hunting company located on 8,000 acres of private land, consisting of four hunting preserves (Sage Canyon Outfitters 2024). The company offers fee-based guided and non-guided hunting trips and lodging. Due to the low demand and availability of similar hunting opportunities in the region that are on public land, this resource is not considered an important recreation 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(2)(a-e) are summarized as follows:

- 1. 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.

- 2. 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.

- 3. 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.

4. *Availability or rareness; and*

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

5. *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 occurred on a case-by-case basis. Attachment T-1 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 and the potential for impacts are discussed in the following section.

Based on the importance criteria described above, the single identified recreation resource, the Sage Canyon Outfitters, has been determined to not be an important recreational opportunity for the purposes of this application. Therefore, an impact assessment was not conducted (see below).

4.0 Impact Assessment – OAR 345-021-0010(1)(t)(B)&(C)

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

- (i) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation;*
- (ii) Noise resulting from facility construction or operation;*
- (iii) Increased traffic resulting from facility construction or operation;*
- (iv) Visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality;*

OAR 345-021-0010(1)(t)(C) An evaluation of the significance of the potential adverse impacts identified under paragraph (B);

OAR 345-021-0010(1)(t)(B) and (C) require a description and evaluation of significance of any potential adverse impacts to the identified important recreational opportunities including, but not limited to (i) direct or indirect loss of opportunity, (ii) noise, (iii) traffic, or (iv) visual. In this case the single identified recreational resource, Sage Canyon Outfitters, is not considered to be important for the purposes of this application; therefore, an impact assessment is unnecessary.

5.0 Minimization and Mitigation Measures – OAR 345-021-0010(1)(t)(D)

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

As described in Section 4, the Facility will have no significant, indirect or direct adverse impacts on any important recreational opportunity in the analysis area. The single identified recreational resource, Sage Canyon Outfitters, was deemed not an important recreational opportunity for the purposes of this application and thus no associated impact assessment was conducted per OAR 345-021-0010(t)(B) and (C). Consequently, no mitigation measures are proposed to avoid, reduce, or otherwise mitigate significant adverse impacts.

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

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

Because construction and operation of the proposed Facility will have no significant adverse impacts on any important 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 Submittal Requirements

7.1 Submittal Requirements

Table T-1. Submittal Requirements Matrix

Requirement	Location
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:	-
(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

Requirement	Location
(B) A description of any potential adverse impacts to the important opportunities identified in paragraph (A) including, but not limited to:	Section 4.0
(i) Direct or indirect loss of a recreational opportunity as a result of facility construction or operation.	Section 4.0
(ii) Noise resulting from facility construction or operation.	Section 4.0
(iii) Increased traffic resulting from facility construction or operation.	Section 4.0
(iv) Visual impacts of facility structures or plumes, including but not limited to, changes in landscape character or quality;	Section 4.0
(C) An evaluation of the significance of the potential adverse impacts identified under paragraph (B);	Section 4.0
(D) A description of any measures the applicant proposes to avoid, reduce or otherwise mitigate any significant adverse impacts identified in paragraph (B);	Section 5.0
(E) A map of the analysis area showing the locations of important recreational opportunities identified in paragraph (A); and	Section 3.0, Figure T-1
(F) The applicant’s proposed monitoring program, if any, for impacts to important recreational opportunities.	Section 6.0

7.2 Approval Standards

Table T-2. Approval Standards

Requirement	Location
OAR 345-022-0100 Recreation	-
(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.	Section 4.0
(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; (b) The degree of demand; (c) Outstanding or unusual qualities; (d) Availability or rareness; (e) Irreplaceability or irretrievability of the opportunity.	Attachment T-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

Requirement	Location
(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

8.0 References

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Figure

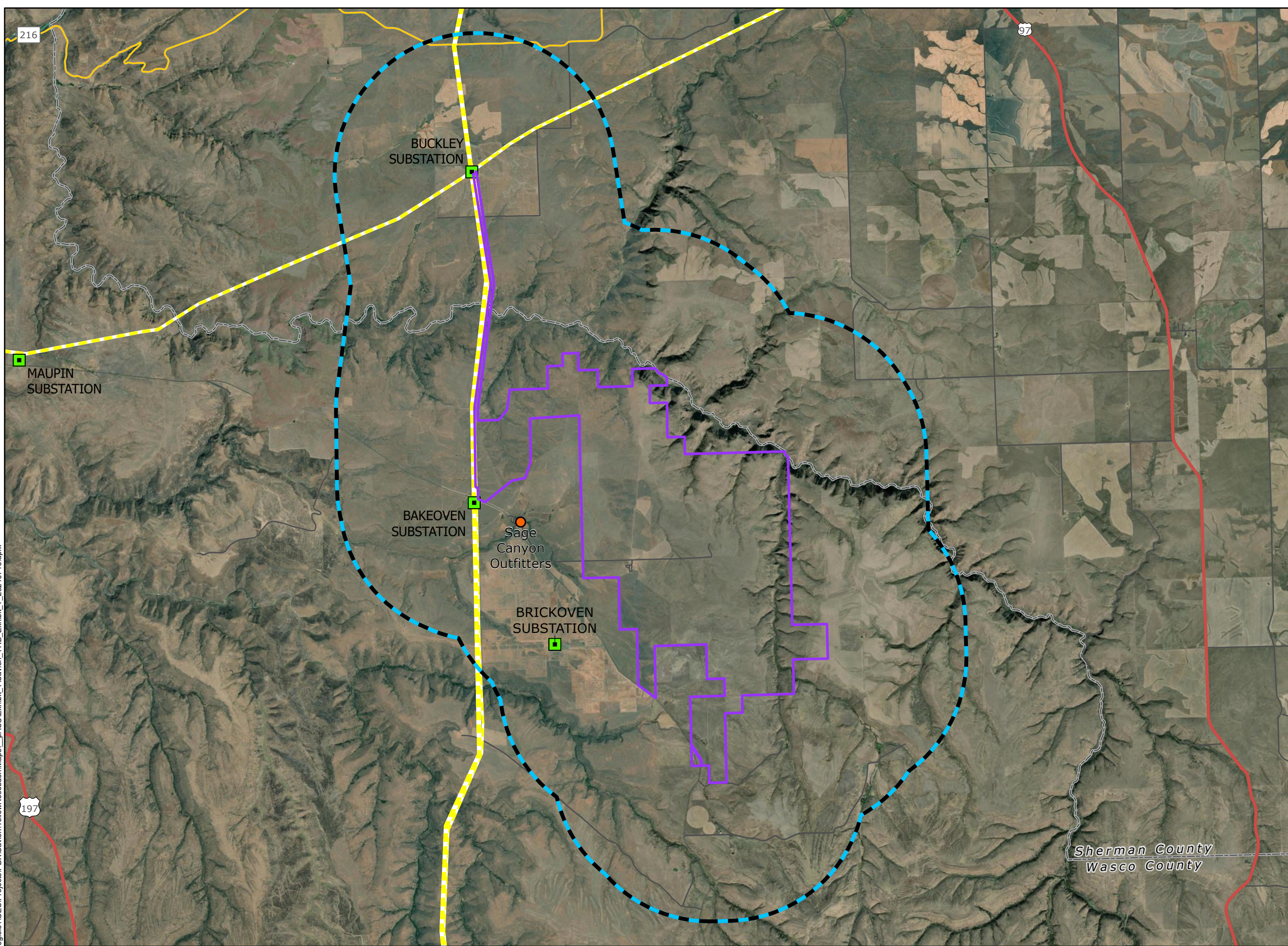
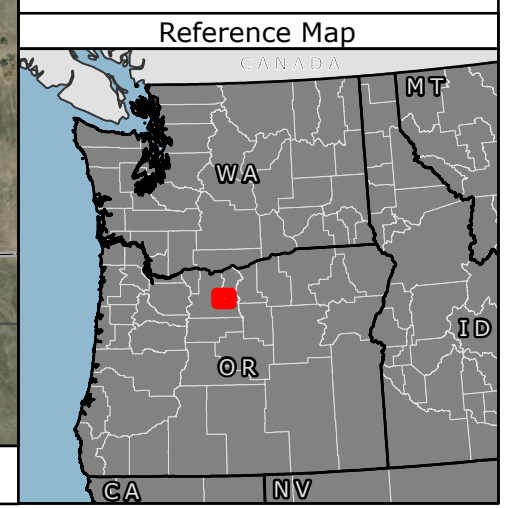
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Yellow Rosebush Energy Center

Figure T-1 Recreation Opportunities within the Analysis Area

SHERMAN AND WASCO
COUNTIES, OR

-  Facility Site Boundary
-  Recreational Opportunities Analysis Area (2-mile Buffer)
-  County Boundary
-  US Highway
-  State Highway
-  Local Roads
-  Existing Transmission Line 500-kV
-  Existing Substation
- Recreational Opportunities**
-  Private Hunting

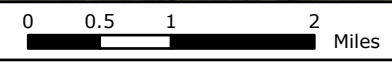


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1:85,000

WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

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

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Recreational Opportunity	Responsible Entity	Distance to Facility (miles)		Description	Size or Distance	Importance Factors					Important Recreation Resource?
		Gen-tie/Collector Lines	Solar Array			Special Designation	Demand	Outstanding or Unusual Qualities	Rareness	Replaceability	
Federal											
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
State											
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Local											
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Private											
Sage Canyon Outfitters (participating landowner)	Private; Sage Canyon Outfitters	0.8	0.5	Upland bird hunting on private land with varying terrain, consisting of four hunting preserves, organic lavender fields, and sightseeing opportunities. The site offers both guided and non-guided hunting trips and lodging (Sage Canyon Outfitters 2024).	8,000 acres total on 4 hunting preserves	None	Low	Prime upland bird habitat near the Deschutes River; A guide that knows the site is available.	Common; Hunting opportunities exist in region on public land where you don't have to pay.	Replaceable	No