

**EXHIBIT L**  
**IMPACTS ON PROTECTED AREAS**  
OAR 345-021-0010(1)(L)

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## L.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 protected areas within a specified distance of the Facility, as required by OAR 345-021-0010(1)(L).

## L.2 PROTECTED AREAS INVENTORY

In accordance with OAR 345-001-0010(57)(e), the analysis area for protected areas consists of the area within the Facility site boundary and 20 miles from the Facility site boundary. Figure L-1 shows the analysis area for protected areas. No protected areas are located within the site boundary.

Protected areas in the analysis area are inventoried in Table L-1. Table L-1 shows the approximate distance from the Facility to the closest point of the protected area boundary, and the direction of each protected area from the Facility. A total of 16 categories of protected area designations are identified in OAR 345-022-0040(1). The inventory of protected areas conducted for this Exhibit was based on a review of available geographic information system data, maps, and other information pertaining to the relevant OAR categories.

**OAR 345-021-0010(1)(L)** *Information about the proposed facility’s impact on protected areas, providing evidence to support a finding by the Council as required by OAR 345-022-0040, including:*

**Response:** OAR 345-021-0010(1)(L) requires that the Application for Site Certificate for a proposed energy facility address impacts on the protected areas defined in OAR 345-022-0040(l)(a)-(p). According to OAR 345-022-0040(1), for an energy facility located outside any defined protected area, the Council must find that, “*taking into account mitigation, the design, construction and operation of the Facility are not likely to result in significant adverse impact to the areas listed [in OAR 345-022-0040(1)(a)-(p)]*” before issuing a site certificate.

As shown on Figure L-1, the proposed Facility is located outside the protected areas defined in OAR 345-022-0040(1)(a)-(p). Therefore, to address OAR 345-022-0040 and demonstrate that the Facility will not result in significant adverse impacts on protected areas, the Applicant has undertaken a systematic analysis of potential Facility impacts on protected areas within 20 miles of the proposed Facility site boundary. The results of this analysis are presented in accordance with OAR 345-021-0010(1)(L), and provide evidence to support a finding by the Council as required by OAR 345-022-0040.

## L.3 LIST OF PROTECTED AREAS AND MAP OF LOCATION

**OAR 345-021-0010(1)(L)(A)** *A list of the protected areas within the analysis area showing the distance and direction from the proposed facility and the basis for protection by reference to a specific subsection under OAR 345-022-0040(1).*

**Response:** The analysis area for impacts on protected areas includes the area within the Facility site boundary and the area within 20 miles of the Facility site boundary in accordance with OAR 345-001-0010(2) and 345-001-0010(59)(e). Table L-1 lists the protected areas in the analysis area and the specific OAR 345-022-0040(1)(a-p) rule reference for each area.

**Table L-1. Protected Areas within the 20-Mile Analysis Area**

<b>Protected Area</b>	<b>Approximate Distance from the Facility to the Closest Point of the Protected Area Boundary (miles)</b>	<b>Direction from Facility</b>	<b>Basis for Protection (OAR 345-022-0040(1) Subsection)<sup>a</sup></b>
Lost Forest-Sand Dunes-Fossil Lake ACEC	4.5	North	(o) Bureau of Land Management areas of critical environmental concern, outstanding natural areas, and research natural areas
Sand Dunes Wilderness Study Area	4.6	North	(c) Wilderness areas
Diablo Mountain Wilderness Study Area	7.1	Southwest	(c) Wilderness areas
Black Hills ACEC and RNA	8.8	West	(o) Bureau of Land Management areas of critical environmental concern, outstanding natural areas, and research natural areas
Four Craters Lava Bed Wilderness Study Area	9.1	Northwest	(c) Wilderness areas
Lost Forest RNA and ACEC	9.8	Northeast	(o) Bureau of Land Management areas of critical environmental concern, outstanding natural areas, and research natural areas
Lost Forest ISA Wilderness Study Area	9.9	Northeast	(c) Wilderness areas
Summer Lake Wildlife Area and State Conservation Area	16.9	Southwest	(p) State wildlife areas and management areas
Squaw Ridge Lava Bed Wilderness Study Area	17.1	Northwest	(c) Wilderness areas
Summer Lake Migratory Waterfowl and Game Management Area	17.6	Southwest	(p) State wildlife areas and management areas
Table Rock ACEC	18.3	West	(o) Bureau of Land Management areas of critical environmental concern, outstanding natural areas, and research natural areas

<sup>a</sup> Under OAR 345-022-0040(1), no areas meet the criteria stated in subsections (a), (b), (d), (e), (f), (g), (h), (i), (j), (k), (l), (m), and (n) in the analysis area.

**OAR 345-021-0010(1)(L)(B)** *A map showing the location of the proposed facility in relation to the protected areas listed in OAR 345-022-0040 located within the analysis area.*

**Response:** In accordance with OAR 345-021-0010(1)(L)(B), Figure L-1 shows the general location of the Facility site, the 20-mile analysis area around the Facility site boundary, and the protected areas identified in the analysis area.

**L.4 POTENTIAL IMPACTS OF PROPOSED FACILITY**

**OAR 345-021-0010(1)(L)(C)** *A description of significant potential impacts of the proposed facility, if any, on the protected areas including, but not limited to, potential impacts such as:*

- (i) *Noise resulting from facility construction or operation;*
- (ii) *Increased traffic resulting from facility construction or operation;*
- (iii) *Water use during facility construction or operation;*
- (iv) *Wastewater disposal resulting from facility construction or operation;*
- (v) *Visual impacts of facility structures or plumes; and*
- (vi) *Visual impacts from air emissions resulting from facility construction or operation, including, but not limited to, impacts on Class 1 Areas as described in OAR 340-204-0050.*

#### **L.4.1 Potential Noise, Traffic, Water Use, and Wastewater Disposal Impacts**

**Response:** The listed protected areas are located at least 4 miles or more from the Facility site boundary. An evaluation of potential impacts on protected areas within the analysis area from noise, traffic, water use, wastewater disposal, and visual impacts will be completed.

- (i) *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.

- (ii) *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.

- (iii) *Water use during facility construction or operation;*

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

- (iv) *Wastewater disposal resulting from facility construction or operation;*

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

#### **L.4.2 Potential Visual Impacts**

- (v) *Visual impacts of facility structures or plumes;*

**Response:** The Applicant's visual resource specialist will conduct a field visit throughout the Facility's 20-mile protected areas analysis area. Protected areas or a nearby vantage point will be visited to establish sight lines to the Facility and the potential for visual impacts from Facility structures. The methodology used in the field visit by the visual resource specialist to assess potential visual impacts to protected areas will be the same as described in Section R.2 of Exhibit R.

The field visit will focus on assessing and documenting with photographs the potential views of Facility components from protected areas. The visual resource specialist will rely on field observations, review of aerial photography, and professional expertise to assess the extent to which the Facility will be visible, including an evaluation of the screening potential of existing development, topography, and vegetation. Topographic features, elevation change, and the type, density, and height of vegetation will be considered when assessing screening potential. Another criterion used by the visual resource specialist to assess the level of Facility visibility from the applicable protected areas will be the distance between the two areas. Sections L.4.2.1 through L.4.2.9 provide additional description.

#### **L.4.2.1 Lost Forest-Sand Dunes-Fossil Lake ACEC**

Significant adverse impacts on the Lost Forest-Sand Dunes-Fossil Lake ACEC are not anticipated and will be confirmed during final analysis.

#### **L.4.2.2 Sand Dunes Wilderness Study Area**

Significant adverse impacts on the Sand Dunes WSA are not anticipated and will be confirmed during final analysis.

#### **L.4.2.3 Diablo Mountain Wilderness Study Area**

Significant adverse impacts on the Diablo Mountain WSA are not anticipated and will be confirmed during final analysis.

#### **L.4.2.4 Black Hills ACEC and RNA**

Significant adverse impacts on the Black Hills ACEC and RNA are not anticipated and will be confirmed during final analysis.

#### **L.4.2.5 Four Craters Lava Bed Wilderness Study Area**

Significant adverse impacts on the Four Craters Lava Bed WSA are not anticipated and will be confirmed during final analysis.

#### **L.4.2.6 Lost Forest ACEC and RNA**

Significant adverse impacts on the Lost Forest ACEC and RNA are not anticipated and will be confirmed during final analysis.

#### **L.4.2.7 Lost Forest ISA Wilderness Study Area**

Significant adverse impacts on the Lost Forest ISA WSA are not anticipated and will be confirmed during final analysis.

#### **L.4.2.8 Summer Lake Wildlife Area and State Conservation Area**

Significant adverse impacts on the Summer Lake Wildlife Area are not anticipated and will be confirmed during final analysis.

#### **L.4.2.9 Squaw Ridge Lava Bed Wilderness Study Area**

Significant adverse impacts on the Squaw Ridge Lava Bed WSA are not anticipated and will be confirmed during final analysis.

#### **L.4.2.10 Summer Lake Migratory Waterfowl and Game Management Area**

Significant adverse impacts on the Summer Lake Migratory Waterfowl and Game Management Area are not anticipated and will be confirmed during final analysis.

#### **L.4.2.11 Table Rock ACEC**

Significant adverse impacts on the Table Rock ACEC are not anticipated and will be confirmed during final analysis.

#### **L.4.3 Class I Areas**

- (vi) *Visual impacts from air emissions resulting from facility construction or operation, including, but not limited to, impacts on Class 1 Areas as described in OAR 340-204-0050.*

**Response:** Significant adverse impacts are not anticipated and will be confirmed during final analysis.

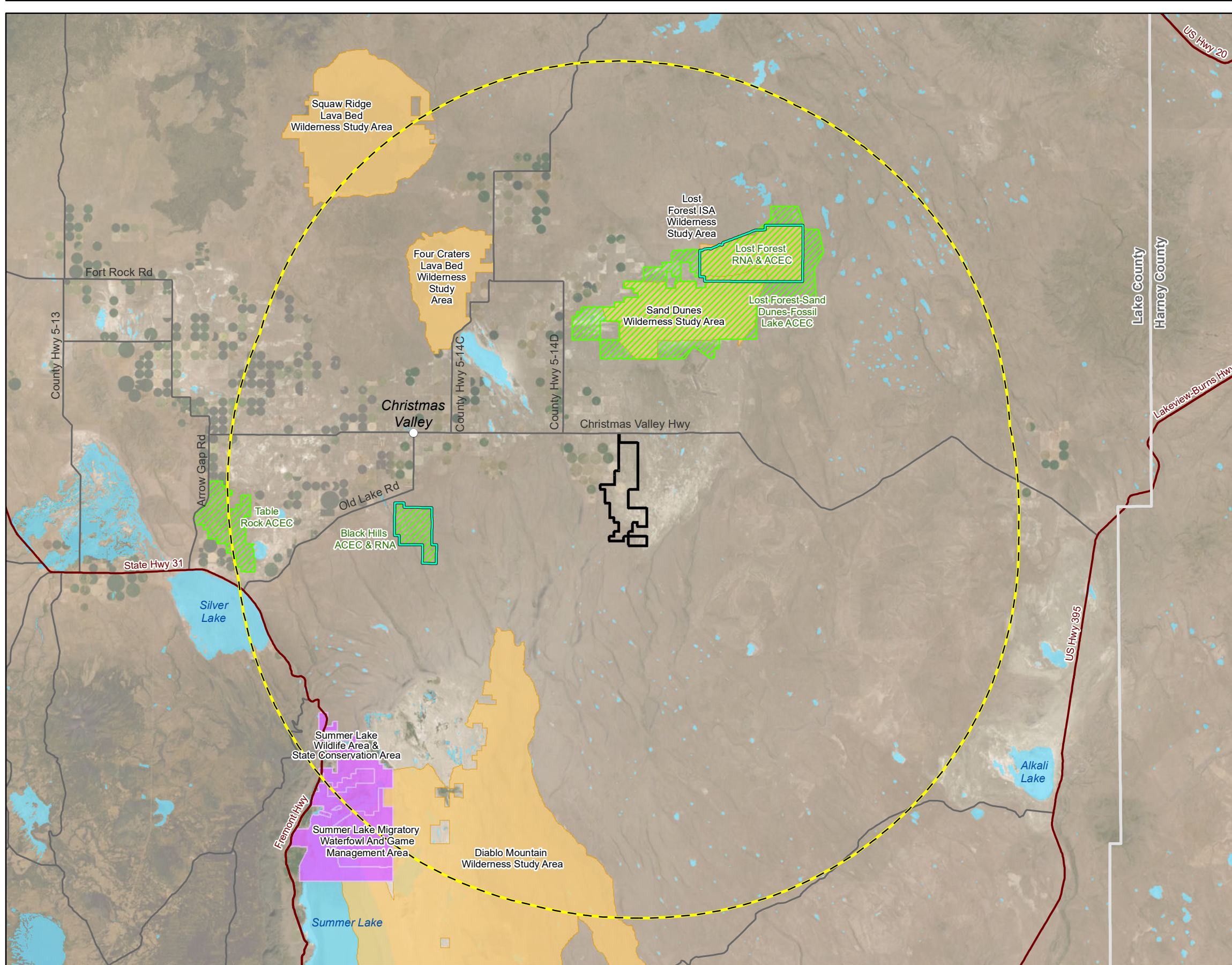
**L.5 SUMMARY**

The design, construction, and operation of the Facility are not anticipated to cause direct or indirect noise, traffic, water, wastewater, or visual impacts likely to result in significant adverse impacts to protected areas.

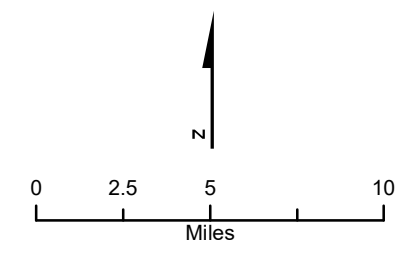
**L.6 REFERENCES**

None.

Figure



- Legend**
- Facility Site Boundary
  - Archway Site Protected Areas Analysis Area (20 miles)
  - County
  - Highway
  - Waterbody
- Protected Areas**
- BLM Area of Critical Environmental Concern (ACEC)
  - BLM Research Natural Area (RNA)
  - BLM Wilderness Study Area
  - State Wildlife Area and Management Area



**Figure L-1**  
**Protected Areas within 20 Miles**  
**of the Facility Site Boundary**  
 Application for Site Certificate  
 Archway Solar Energy Facility  
 Lake County, Oregon