

EXHIBIT T
RECREATIONAL FACILITIES AND OPPORTUNITIES
 OAR 345-021-0010(1)(t)

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T.1 INTRODUCTION

Troutdale Energy Center, LLC (Applicant) proposes to permit the construction and operation of a natural gas-fired power plant at the Port of Portland-owned Troutdale Reynolds Industrial Park (TRIP) located in the City of Troutdale, Oregon.

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 to 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:

(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 opportunity¹.*

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

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: As discussed above, 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 in **Figure T-1**. In general, recreational activities within the analysis area include wildlife viewing, camping,

¹ 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.

boating, hiking, photography, angling, and waterfowl hunting. 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 Applicant's certified planners evaluated the potential importance of all recreational opportunities within the 5-mile analysis area. Based on this evaluation, 14 important recreational opportunities have been identified in the analysis area and are shown in **Figure T-1**. **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	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Columbia River Gorge National Scenic Area (NSA)	0.2	Designated as an NSA and managed under the <i>Columbia River Gorge Management Plan</i> (Columbia River Gorge Commission, 2011). Managed jointly through Columbia River Gorge Commission and U.S. Forest Service (USFS)	High	Recognized by the federal government through the National Scenic Area Act for its outstanding landscapes, hiking, wildlife viewing, and other recreational opportunities	Uncommon	Irreplaceable
Important Recreational Opportunities Located Partially or Entirely Within the Columbia River Gorge NSA						
Sandy River Delta Recreation Area	0.2	USFS	High	Offers joggings trails, hiking, horseback riding, and bird watching as well as access to the Sandy and Columbia river shorelines	Somewhat uncommon	Somewhat replaceable
Lewis and Clark State Recreation Area (SRA)	0.6	Oregon Parks and Recreation Department (OPRD)	High	Commemorates location where Lewis and Clark camped and explored in 1805	Uncommon	Irreplaceable
Lewis and Clark National Historic Trail	0.6	Managed by National Park Service (NPS) through the <i>Lewis and Clark National Historic Trail Comprehensive Plan for Management and Use</i> (NPS, 1982)	Moderate	Spans 11 states and covers the historic trail used by the Lewis and Clark Expedition	Uncommon	Irreplaceable
Historic Columbia River Highway	1.1	Managed by OPRD and Oregon Department of Transportation (ODOT) through the <i>Historic Columbia River Highway Master Plan</i> (ODOT, 1996)	Moderate to High	Scenic drive that provides access to high-quality recreational opportunities outside the 5-mile analysis area, including hiking, biking, sailing, windsurfing, fishing, and photography	Uncommon	Irreplaceable
Reed Island State Park	2.7	Designated as a National Historic Landmark Washington State Parks and Recreation Commission (WSPRC) ^b	Low	Marine park that is accessible by boat only	Uncommon	Somewhat replaceable

TABLE T-1
Summary of Recreational Importance Evaluation

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Important Recreational Opportunities Located Outside the Columbia River Gorge NSA						
40-Mile Loop Trail	<0.1	40-Mile Loop Land Trust	High	System of connected recreational trails in the Portland Metro Area proposed as part of the planning for the Lewis and Clark Centennial Exposition and World's Fair in 1904	Common opportunities in the area	Somewhat replaceable
Sandy River Water Trail	0.1	U.S. Bureau of Land Management (BLM), OPRD	Moderate	Provides a 48-mile water trail for boating, kayaking, and water sports on the Sandy River between Alder Creek and the Columbia River	Uncommon	Irreplaceable
Lower Columbia River Water Trail	0.4	Lower Columbia River Estuary Partnership	Moderate	Provides a 146-mile water trail for boating, kayaking, and water sports on the Lower Columbia River from Bonneville Dam to the Pacific Ocean	Uncommon	Irreplaceable
Blue Lake Regional Park	0.4	Metro	High	Attractive community park that includes a 64-acre natural lake fed by underground springs	Somewhat uncommon	Somewhat replaceable
Mount Hood Scenic Byway	0.8	Managed by ODOT and USFS through the <i>Mount Hood National Scenic Byway Interpretive Plan and Design Guidelines</i> (USFS, 2009) Designated as a Scenic Byway	High	National Scenic Byway offering outstanding geologic scenery and access to waterfalls, temperate rain forests, and the last leg of the Oregon Trail at Barlow Road	Somewhat uncommon	Somewhat replaceable
Government Island SRA	1.1	OPRD	Moderate to Low	Marine park that is accessible by boat only	Somewhat uncommon	Somewhat replaceable
Sandy River National Wild and Scenic River	2.7	Managed by BLM through the <i>Sandy River Basin Integrated Management Plan</i> (BLM, 2008)	High	Designated as a "Wild and Scenic" River	Uncommon	Irreplaceable
Dabney State Recreation Area	2.8	OPRD	High	Popular summer recreation area offering hiking trails, swimming, picnic tables and grills, and a disc golf course	Uncommon	Irreplaceable

Notes:

Metro = The regional government for the Portland Metropolitan area

^a Approximate distances provided are measured from the Facility site boundary to the nearest point of the recreational opportunity.

^b Three of the 14 important recreational opportunities identified in this Exhibit are located partially or entirely within the State of Washington. Although the Applicant has studied potential impacts to all important recreational opportunities within the analysis area, the Applicant reserves the right to take the position that applicable Oregon law does not require analysis of recreational opportunities outside of Oregon.

Eighty-two city parks and six trails not listed in **Table T-1** are located within the 5-mile analysis area in Oregon and Washington; however, these parks and trails are not considered “important” because they do not meet the criteria prescribed in OAR 345-022-0100; they lack special designation or management, are not unusual, and could be replaced if impacted. In addition, a variety of golf courses, recreational vehicle (RV) parks, and marinas are located within the analysis area. However, they are not identified in **Figure T-1** as they are privately owned and do not meet any of the OAR 345-022-0100 criteria.

A comprehensive list of all recreational opportunities identified within the 5-mile analysis area is included as **Attachment T-1**. Additionally, a recreational importance evaluation is included as **Attachment T-2** for recreational resources located within the 5-mile analysis area that did not satisfy the OAR 345-022-0100 criteria.

Based on this evaluation, 14 important recreational opportunities have been identified within the 5-mile analysis area, as described in **Sections T.2.1** through **T.2.3**

T.2.1 Columbia River Gorge National Scenic Area

The nearest portion of the Columbia River Gorge NSA is located approximately 0.2 mile east of the proposed Facility site. The Columbia River Gorge NSA is managed jointly by the USFS and the CRGC and encompasses 292,500 acres over 83 miles. Due to its abundant recreational opportunities and its proximity to the Portland Metro Area and surrounding population centers, the degree of demand for the Columbia River Gorge NSA is high. Areas of particular interest include the Vista House at Crown Point, which receives over one million visitors annually (FOVH, 2012).

The Columbia River Gorge NSA provides a variety of outstanding recreational opportunities including fishing, hiking, windsurfing, rafting, mountain biking, and wildlife viewing set to the iconic backdrop of the Columbia River Gorge. As the only NSA located in the State of Oregon, the recreational opportunities available in the Columbia River Gorge NSA are both uncommon and irreplaceable.

Due to its high degree of demand, outstanding qualities, and irreplaceability as the only NSA in the State of Oregon, the Columbia River Gorge NSA satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.2 Recreational Opportunities Located Within the Columbia River Gorge National Scenic Area

As shown above in **Table T-1**, six of the 14 important recreational opportunities identified within the 5-mile analysis area are located partially or entirely within the Columbia River Gorge NSA. The following analysis will evaluate the importance of these resources under the criteria contained in OAR 345-022-0100.

T.2.2.1 Sandy River Delta Recreation Area

The nearest portion of the Sandy River Delta Recreation Area is located approximately 0.2 mile east of the proposed Facility site. The recreation area is managed by the USFS and is comprised of a trail network at the confluence of the Sandy and Columbia rivers. The recreation area is heavily used by hikers, joggers, and dog walkers, and includes unique recreational opportunities such as horseback riding, shore access to the Sandy River, and access to a bird blind for bird watching. Public use is restricted in the southeast portion of the recreation area where the delta is closed in an effort to protect and enhance wildlife habitat and function.

The recreation area itself is not located in a particularly scenic location, and portions of the trail system have views of high-voltage transmission lines that traverse the northern and northeastern portions of the recreation area. Given the abundant and high-quality recreational opportunities found throughout the

Columbia River Gorge NSA, the recreational opportunities at the recreation area are considered somewhat replaceable.

Due to its high degree of demand and somewhat uncommon recreational opportunities, the Sandy River Delta Recreation Area satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.2.2 Lewis and Clark State Recreation Area

The nearest portion of the Lewis and Clark State Recreation Area is located approximately 0.6 mile southeast of the Facility. The recreation area is managed by OPRD, and it commemorates a camping and exploration spot used during the Lewis and Clark Expedition in November 1805. The recreation area is also situated at the mouth of the Sandy River and is one of the entrances to the Historic Columbia River Highway. The degree of demand for this recreation area is high in part because of its proximity to the City of Troutdale. In addition, the variety of recreational opportunities available supports the recreation area's high demand. For example, the recreation area includes one of the most popular swimming areas on the Sandy River, a public boat launch, as well as a trail to Broughton Bluff, the geologic boundary between the Cascade Range and the Willamette Valley (OPRD, 2011).

The recreational opportunities available at the Lewis and Clark State Recreation Area are uncommon and irreplaceable given the historic significance of the area as well as the unique geologic backdrop of Broughton Bluff and access to the Sandy River.

Due to its high degree of demand and outstanding qualities, the Lewis and Clark State Recreation Area satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.2.3 Lewis and Clark National Historic Trail

The nearest portion of the Lewis and Clark National Historic Trail is located approximately 0.6 mile southwest of the Facility. The Trail is managed by NPS through the *Lewis and Clark National Historic Trail Comprehensive Plan for Management and Use* (NPS, 1982). The trail spans 11 states and crosses approximately 3,700 miles (NPS, 2012). Within the 5-mile analysis area, the degree of demand is moderate for recreational opportunities along the trail, as the majority of visitors recreate at the Points of Interest along the trail. The only Point of Interest located within the 5-mile analysis area is the Lewis and Clark State Recreation Area, discussed in **Section T.2.2.2**.

Recreational opportunities available along the trail are fairly common in the area and include hiking, plant and wildlife viewing, photography, and mountain biking. However, given the historical significance of the trail, the recreational opportunities available throughout this location are considered to be uncommon and irreplaceable.

Due to its historic significance and its designation by NPS as a National Historic Trail, the Lewis and Clark National Historic Trail satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.2.4 Historic Columbia River Highway

The nearest portion of the Historic Columbia River Highway is located approximately 1.1 mile south of the proposed Facility site. The highway is managed jointly by ODOT and OPRD, and is listed as a National Historic Landmark on the National Register of Historic Places (FOHCRH, 2012). The highway is approximately 70 miles long and provides a scenic drive and access to numerous recreational opportunities between the cities of Troutdale and The Dalles. The highway does not receive as many

vehicle trips as I-84, which provides access to many of the same recreational resources, but it is a popular and well-used road for travelers and recreationists.

Within the 5-mile analysis area, the highway provides intermittent scenic views of the Sandy River, and serves as a point of access to Dabney State Recreation Area and the portion of the Sandy River designated as “Wild and Scenic” (**Figure T-1**). The highway also extends east into the Columbia River Gorge NSA, where it serves as a scenic access corridor to iconic tourist destinations and recreational opportunities outside of the 5-mile analysis area (for example, the Vista House at Crown Point and Multnomah Falls).

Labeled the “King of Roads,” the Historic Columbia River Highway was constructed between 1913 and 1916 and is lauded as a technical and civic achievement of its time (USDOT, 2009). The highway was designated as the first Scenic Byway in the United States and was the first Scenic Byway designated as a National Historic Landmark, making it an uncommon and irreplaceable piece of recreational infrastructure.

Due to its scenic views, special designation as a National Historic Landmark, rich history, and the access that it provides to important recreational opportunities, the Historic Columbia River Highway satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.2.5 Reed Island State Park

The nearest portion of Reed Island State Park is located 2.7 miles east of the proposed Facility site. The park is managed by WSPRC and provides a 510-acre marine park accessible only by boat (WSPRC, 2012). Located on the Columbia River just southeast of Washougal, Washington, the park provides recreational opportunities such as bird watching, boating, camping, and picnicking. Because the park is only accessible by boat, a large portion of the general public does not have access to the recreational opportunities available on the island. Furthermore, the park only offers two primitive campsites and no restrooms are available, further limiting access of recreational amenities. Therefore, degree of demand for the park is considered low.

That being said, the same features that restrict access to the Reed Island State Park and limit availability of recreational amenities also make the park an uncommon recreational opportunity for individuals seeking a more rugged recreational experience. The park is one of only two resources within the 5-mile analysis area that allows camping via exclusive boat access. While the recreational opportunities provided at the park are uncommon for these reasons, they are also somewhat replaceable given the abundant camping and hiking opportunities throughout the Columbia River Gorge NSA.

Due to its secluded location and rustic recreational opportunities, Reed Island State Park satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.3 Recreational Opportunities Located Outside the Columbia River Gorge National Scenic Area

As shown in **Table T-1**, eight of the 14 important recreational opportunities identified within the 5-mile analysis area are located outside of the Columbia River Gorge NSA. The following analysis will evaluate the importance of these resources under the criteria contained in OAR 345-022-0100.

T.2.3.1 40-Mile Loop Trail

The nearest portion of the 40-Mile Loop Trail is located less than 0.1 mile (approximately 70 feet) north of the proposed Facility site. The trail is maintained by the 13 local jurisdictions it crosses, but planning efforts for the trail are managed by the 40-Mile Loop Land Trust. The trail was originally proposed in 1904 by the Olmsted Brothers as part of the planning for the Lewis and Clark Centennial Exposition and World’s Fair (40-Mile LLT, 2004). The loop is not yet complete, though the planned trail has been lengthened to

more than 140 miles to include all of Multnomah County and to connect more than 30 parks, including Portland's Waterfront Park, the Springwater Corridor, and Powell Butte Nature Park. The trail provides recreational opportunities for hikers, joggers, bikers, skateboarders, and horseback riders and is the closest recreation opportunity to the Facility.

Anecdotal evidence from the Port of Portland, which owns and manages land surrounding the trail, indicates that the degree of demand for the trail adjacent to the Facility is high (Christopher, pers. comm., 2011).

The portion of the 40-Mile Loop Trail within the 5-mile analysis area is not located in a particularly scenic location, and portions of the trail have views of high voltage transmission lines and industrial development. Furthermore, given the abundant amount of hiking, biking, and jogging opportunities available within the 5-mile analysis area, the opportunities provided are considered somewhat uncommon and somewhat replaceable.

Due to its high degree of demand, and uniqueness as an extensive, integrated trail network, the 40-Mile Loop Trail satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.3.2 Sandy River Water Trail

The nearest portion of the Sandy River Water Trail is located approximately 0.1 mile northeast of the proposed Facility site. BLM and OPRD manage the water trail in coordination with local jurisdictions including the City of Sandy, which provides ample recreational opportunities including boating, fishing, and water sports. The trail seeks to highlight the abundant recreational opportunities provided by the Sandy River by providing a 38-mile water trail on the Sandy River between Alder Creek and the Columbia River. The trail is geared toward kayakers, and OPRD provides maps showing areas of interest and put-in/take-out locations along the river (OPRD, 2011).

Given that access to the trail is limited to recreational users with watercrafts, degree of demand is considered to be moderate. However, the unique nature of the trail, some of which is set to the backdrop of the portion of the Sandy River designated as "Wild and Scenic," makes this premier recreational opportunity uncommon and irreplaceable².

Due to its uniqueness as one of the premier water trails in the State of Oregon, the Sandy River Water Trail satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.3.3 Lower Columbia River Water Trail

The nearest portion of the Lower Columbia River Water Trail is located approximately 0.4 mile north of the Facility. The Lower Columbia River Estuary Partnership (CREP) provides input and guidance into the trail's development and management with support from the U.S. Environmental Protection Agency (EPA) and U.S. Fish and Wildlife Service (USFWS). The Columbia River provides ample recreational opportunities including boating, fishing, and water sports. The trail seeks to highlight these opportunities by providing a 146-mile water trail on the Lower Columbia River between Bonneville Dam and the Pacific Ocean. The trail is geared toward canoe and kayak users, and CREP provides maps showing campsites, areas of interest, and restaurants to stop at along the 146-mile trek (CREP, 2012).

Given that access to the trail is limited to recreational users with watercrafts, degree of demand is considered to be moderate. However, the unique nature of the trail, much of which is set to the backdrop

² The portion of the Sandy River designated as "Wild and Scenic" is 2.7 miles southeast of the Facility.

of the Columbia River Gorge NSA, makes this premier recreational opportunity uncommon and irreplaceable.

Due to its uniqueness as one of the premier water trails in the State of Oregon, the Lower Columbia River Water Trail satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.3.4 Blue Lake Regional Park

The nearest portion of Blue Lake Regional Park is located approximately 0.4 mile west of the proposed Facility site. Metro manages the park, which offers an 82-acre park with a 64-acre natural lake fed by underground springs (Metro, 2009). The park features a small water park for children and the lake provides boating, fishing, and swimming opportunities for recreational users. Picnicking, hiking, and group sports are also popular activities in the park.

Given the variety of recreational opportunities, and the proximity of the park to population centers in the cities of Portland, Fairview, Gresham, and Troutdale, the degree of demand is considered high. While a recreational facility that offers all of these opportunities in one place is somewhat uncommon within the 5-mile analysis area, the opportunities themselves are somewhat common given the abundant supply of hiking, picnicking, and water sport opportunities available in the 5-mile analysis area. Therefore, the recreational opportunities are considered somewhat uncommon and somewhat replaceable.

Due to its high degree of demand, and unique variety of recreational opportunities, the Blue Lake Regional Park satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.3.5 Mount Hood Scenic Byway

The nearest portion of the Mount Hood Scenic Byway is located approximately 0.8 mile south of the proposed Facility site. The byway is managed jointly by USFS and ODOT under the *Mount Hood National Scenic Byway Interpretive Plan and Design Guidelines* (USFS, 2009). Additionally, the byway is listed as a Scenic Byway by the Federal Highway Administration. The byway is approximately 105 miles in length and provides a scenic drive and access to numerous recreational opportunities between the City of Portland and the Mount Hood National Forest. The byway has a high degree of demand, primarily from users accessing recreational opportunities outside of the 5-mile analysis area including Mount Hood and Multnomah Falls.

Within the 5-mile analysis area, the byway provides scenic views of Mount Hood, but does not provide direct access to any of the important recreational opportunities identified in this Exhibit. Therefore, the recreational opportunities provided by the byway within the 5-mile analysis area are considered somewhat uncommon and somewhat replaceable.

Due to its scenic views and special designation as a Scenic Byway, the Historic Columbia River Highway satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.3.6 Government Island State Recreation Area

The nearest portion of the Government Island Recreation Area is located approximately 1.1 mile west of the proposed Facility site. The OPRD-managed recreation area is a series of islands in the Columbia River accessible only by boat. There are two docks and a floating tie-up on the north side of the main island. The recreation area offers opportunities for fishing, and camping is permitted around the perimeter of the area. Hiking trails are also present throughout the island, though the interior of the island is still used for cattle ranching and is off limits to recreational users (OPRD, 2011).

Because the recreation area is only accessible by boat, a large portion of the general public does not have access to the recreational opportunities available on the islands. Furthermore, there is a limited supply of campsites, restrooms, and picnic tables available for public use. Therefore, degree of demand for the recreation area is considered to be moderate to low.

The recreation area is one of only two resources within the 5-mile analysis area that allows camping via exclusive boat access. While the recreational opportunities provided at the recreation area are uncommon for these reasons, they are also somewhat replaceable given the abundant camping and hiking opportunities throughout the Columbia River Gorge NSA.

Due to its secluded location and rustic recreational opportunities, the Government Island State Recreation Area satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.3.7 Sandy River Wild and Scenic River

A segment of the Sandy River located within the 5-mile analysis area is classified as a “Wild and Scenic River” by the National Wild and Scenic Rivers Act (WSRA) (16 USC 1274 [100][C]). This designation extends along the river between Dodge Park and Dabney State Recreation Area (see **Figure T-1**). For the purpose of this Exhibit, this portion of the Sandy River is considered an important recreational opportunity under OAR 345-022-0100.

The nearest portion of the Wild and Scenic segment of the Sandy River is located approximately 2.7 miles southeast of the Facility. The Sandy River is managed by the BLM through the *Sandy River Basin Integrated Management Plan* (BLM, 2008). This portion of the Sandy is extremely popular with anglers and provides outstanding sport fishery and exceptional recreation opportunities for nature study, day-use activities, and non-motorized boating or floating (NWSR, 2011). Given the quality and variety of recreational opportunities available, the degree of demand for the Sandy River is considered to be high.

As a result of this Wild and Scenic designation, the recreational opportunities in this area are considered uncommon and irreplaceable. No other water way is classified as Wild and Scenic within the 5-mile analysis area.

Due to its high degree of demand, and the quality and variety of recreational opportunities, the portion of the Sandy River that is designated as Wild and Scenic satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.2.3.8 Dabney State Recreation Area

The nearest portion of Dabney State Recreation Area is located approximately 2.8 miles southeast of the proposed Facility site within the segment of the Sandy River designated as Wild and Scenic. The recreation area is managed by OPRD and serves as a popular swimming, boating, and picnic location along the Historic Columbia River Highway. Trails are also located throughout the site for day hikes, and a disc golf course was recently added (OPRD, 2011). The recreation area also provides a wide range of recreational amenities including multiple covered picnic shelters, large picnic tables and briquette grills, and a boat ramp.

As a result of the recreational amenities offered, and the fact that the recreation area is located within a segment of a Wild and Scenic River, the degree of demand is considered to be high. Furthermore, the amenities provided at the recreation area, combined with the adjacent Wild and Scenic segment of the Sandy River make the recreation opportunities at this location uncommon and irreplaceable.

Due to its high degree of demand, and the quality and variety of recreational opportunities and amenities, the portion of the Dabney State Recreation Area satisfies the criteria of OAR 345-022-0100 and is classified as an important recreational opportunity.

T.3 SIGNIFICANT POTENTIAL ADVERSE IMPACTS

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

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

Response: For the purpose of this Exhibit, a direct loss is assumed to occur when the Facility's construction or operation impacts 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 resources 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. As demonstrated below in response to OARs OAR 345-021-0010(1)(t)(B)(ii) through (iv), significant adverse impacts related to noise, traffic, and Facility structures or intermittent cooling tower plumes resulting from Facility construction and operation are not anticipated at the important recreational opportunities identified in **Table T-1**. Consequently, the Applicant demonstrates that no indirect loss related to Facility construction or operation is anticipated.

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

Response: As detailed in **Exhibit X**, projected noise levels resulting from Facility construction and operation will meet requirements contained in Oregon Department of Environmental Quality (DEQ) rules. Given the projected noise levels and the distance to the recreational opportunities, Facility construction and operational noise will not significantly affect any of the important recreational resources identified within the 5-mile analysis area.

The important recreational opportunity nearest the proposed Facility is the 40-Mile Loop Trail, which is located less than 0.1 mile (approximately 70 feet) north of the proposed Facility site. In **Exhibit X**, the Applicant provides information about the predicted noise levels during the Facility's construction and operations in accordance with OAR 345-021-0010(1)(x)(A), and also includes an analysis of the Facility's compliance with applicable DEQ noise regulations per OAR 345-021-0010(1)(x)(B). Specifically, **Table X-5** in **Exhibit X** presents the anticipated construction site noise levels at Columbia River Gorge NSA. The dBA levels presented in **Table X-5** are below levels of noise that would have significant impacts given attenuation and the relatively short duration of construction. The calculated levels in **Table X-5** are likely conservative, because the only attenuating mechanism considered was geometric spreading, which results in an attenuation rate of 6 dBA per doubling of distance; attenuation related to the presence of structures, trees or vegetation, ground effects, and terrain is not considered. Furthermore, given that the primary use of the trail is jogging, biking, or walking, recreational user's exposure to construction noise along 40-Mile Loop Trail would be brief in duration. With the mitigation measures described in **Exhibit X**, Facility operational noise levels at this recreational opportunity are not expected to exceed levels that

would create an indirect loss of a recreational opportunity. Furthermore, current use of the 40-Mile Loop Trail, as well as other recreational opportunities within an audible distance of the Facility, are already subject to industrial sources of noise including the Portland-Troutdale Airport, the Federal Express distribution Facility, and automobile traffic from I-84. Therefore, significant adverse impacts to recreational opportunities resulting from noise are not anticipated during Facility construction or operation.

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

Response: As discussed in **Exhibit U**, construction of the Facility will add a maximum of 1,025 daily trips, consisting of 500 daily workers (to and from work) and an additional 25 trips for mobilization/demobilization of materials during peak construction. The likely route of workers will be on I-84, NE Marine Drive, NW Sundial Road, and NW Swigert Way. Construction of the Facility will also require heavy equipment delivery. Delivery of heavy equipment (approximately 30 to 40 pieces of equipment) will be infrequent and will occur during the initial months of the 24-month construction period. **Figure U-1** in **Exhibit U** presents the proposed access routes that will be utilized for delivery of heavy equipment, which primarily avoid routes that are used to access the important recreational opportunities (for example, the Historic Columbia River Highway, the Mount Hood Scenic Byway, I-84).

Facility operation will require three daily shifts (one shift of 10 people, and two shifts of 6 people) and will result in a potential for 44 additional daily trips to I-84, I-205, NE Marine Drive, and NW Sundial Road. NE Marine Drive and NW Sundial Road are classified as major collectors (Multnomah County, 2011).

Given the low volume of traffic required for Facility operation and the Applicant's effort to avoid routes used to access recreational opportunities during construction, significant adverse impacts to recreational opportunities resulting from traffic are not anticipated during Facility construction or operation.

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

Response: The visual impacts of the Facility and cooling tower plumes are discussed in greater detail in **Exhibits L, R, and Z**. However, as some of the recreational opportunities identified in this Exhibit do not fall under the same classifications as those required to be analyzed in these Exhibits, supplemental analysis is provided below to evaluate the potential visual impacts to recreational opportunities.

As discussed in **Exhibit R**, the tallest and most potentially visible Facility structure will be the combined-cycle exhaust stack, which will be up to 175 feet in height. The stack will be a tall, narrow feature that will be connected to the heat recovery steam generator (HRSG). An intermittent cooling tower plume will also result from Facility operations. As described in **Exhibit Z**, conservative model predictions indicate that the heights of visible plumes will typically be less than 75 meters (m) (246 feet) above the cooling tower³. For all seasons, the heights of visible plumes that could form will most frequently be between 0 m and 25 m (0 and 82 feet) above the cooling tower. For most of the year (spring, summer, and fall), the lengths of the visible plumes that could form will most frequently be between 0 and 50 m (0 and 164 feet). During winter, the lengths of the visible plumes that could form are predicted to range between 100 and 200 m (328 and 656 feet).

As shown in **Attachment Z-2** of **Exhibit Z**, the modeling results show that the winter season would have the largest number of predicted hours where a visible plume could be discerned by the general public and the spring season would have the least (see Column D in **Attachment Z-2** of **Exhibit Z**).

³ Given that the CALPUFF modeling output for the plume dimensions is presented in meters, the Applicant has provided the plume dimensions in both meters and feet.

The Applicant developed a viewshed analysis for the Facility that adhered to the methodology outlined in **Section R.3.3.1** in **Exhibit R**. Given the fluctuation in anticipated plume height, the viewshed analysis was generated using the height of the tallest Facility structure that demonstrates where the Facility may be visible. Visibility indicated by the viewshed analysis is highly conservative as it calculates a line-of-sight from the highest point of the exhaust stack. Additionally, the viewshed analysis does not take into account the screening role of trees and other structures. Therefore, the viewshed was used solely for the purpose of performing a desktop analysis of potential visual impacts which provided a framework for a more detailed, comprehensive field survey by the Applicant’s visual resource specialists.

The results of the viewshed analysis indicate that the Facility exhaust stack may be visible from at least a portion of 12 of the 14 important recreational opportunities identified in **Table T-1**. The potential visibility of the Facility from all important recreational opportunities is summarized in **Table T-2**, followed by a discussion of the potential visual impacts based in part on the results of a visual resources field survey.

TABLE T-2
Potential Visibility of Facility from Important Recreational Opportunities

Important Recreational Opportunity	State	Approx. Distance from the Facility to the Closest Point of the Recreational Opportunity Boundary (Miles)	Is Facility Potentially Visible? ^a	Vegetative Screening?
Columbia River Gorge NSA	OR/WA	0.2	Minimally only from isolated areas	Yes
Important Recreational Opportunities Located Partially or Entirely Within the Columbia River Gorge National Scenic Area				
Sandy River Delta Recreation Area	OR	0.2	Yes	Yes - Substantial
Lewis and Clark SRA	OR	0.6	Minimally only from isolated areas	Yes
Lewis and Clark National Historic Trail	OR	0.6	Partially	Yes - Substantial
Historic Columbia River Highway	OR	1.1	Minimally only from isolated areas	Yes - Substantial
Reed Island State Park	WA	2.7	Partially	Yes - Substantial
Important Recreational Opportunities Located Outside the Columbia River Gorge National Scenic Area				
40-Mile Loop Trail	OR	<0.1	Yes	Yes - Partial
Sandy River Water Trail	OR	0.1	Yes	Yes - Substantial
Lower Columbia River Water Trail	OR/WA	0.4	Partially	Yes
Blue Lake Regional Park	OR	0.4	Partially	Yes
Mount Hood Scenic Byway	OR	0.8	Minimally only from isolated areas	Yes
Government Island SRA	OR	1.1	Yes	Yes
Sandy River National Wild and Scenic River	OR	2.7	No	Yes
Dabney SRA	OR	2.8	No	Yes - Substantial

Notes:

^a Potential visibility is determined through viewshed analysis, as outlined in **Section R.3.3.1** of **Exhibit R**.

Three of the 14 important recreational opportunities listed in **Table T-2** are located partially or entirely within Washington. Although the Applicant has undertaken studies of potential impacts to all important recreational opportunities within the analysis area, the Applicant reserves the right to take the position that applicable Oregon law does not require analysis of important recreational opportunities outside of Oregon.

T.3.1 Visual Impacts to Important Recreational Opportunities

T.3.1.1 Columbia River Gorge National Scenic Area

While the Columbia River Gorge NSA is explicitly inapplicable to land uses proposed outside of the gorge's jurisdictional boundary, visual impact analysis was performed for the Columbia River Gorge NSA in accordance with OAR 345-021-0010(1)(t)(B)(iv). Given that several of the important recreational opportunities identified in the 5-mile analysis area are located partially or entirely within the Columbia River Gorge NSA, the analysis presented in **Section T.3.1.2** represents a comprehensive review of visual impacts to important recreational opportunities available in the Columbia River Gorge NSA. As demonstrated below, the Facility will not result in significant adverse visual impacts to any of the individual important recreational opportunities available in the Columbia River Gorge NSA. Therefore, it can be concluded that the Facility will not have significant adverse visual impacts to the Columbia River Gorge NSA as a whole.

T.3.1.2 Important Recreational Opportunities Located Within the Columbia River Gorge National Scenic Area

As shown in **Table T-2**, five of the 14 important recreational opportunities identified within the 5-mile analysis area are located within the Columbia River Gorge NSA. The following analysis evaluates visual impacts from the Facility on important recreational opportunities that lie within the Columbia River Gorge NSA.

Sandy River Delta Recreation Area

The nearest portion of the Sandy River Delta Recreation Area is approximately 0.2 mile east of the proposed Facility site. The viewshed analysis shows that the Facility will be visible from the majority of the Recreation Area based on topography alone. However, dense vegetation throughout the recreation area trail system and along the banks of the Sandy River delta will screen potential views of Facility structures and intermittent cooling tower plumes. The Applicant's visual resource specialists confirmed that evergreen and deciduous trees and shrubs present throughout the recreation area will completely screen views from the vast majority of this important recreational opportunity. Furthermore, the trail network, which is arguably the most popular and heavily used portion of the recreation area, is located in a dense forest and is oriented to the east away from the Facility. Therefore, views of Facility structures or intermittent cooling tower plumes are not anticipated from the designated trail system within the recreation area.

While not accessible by the designated trail system, there is a portion of the recreation area along the Sandy River that is still popular with recreational users. This area is located along the east bank of the Sandy River, and provides direct access to the beach and the Sandy River for swimming. Because this portion of the recreation area is along the shore, it has the least amount of vegetative screening; therefore, it is considered the portion of the recreation area most vulnerable to experience impacts from views of the Facility.

Due to the popularity of the Sandy River Delta Recreation Area and its proximity to the Facility, this location was selected as one of the five representative viewpoints that were used for the preparation of visual simulations showing the area as it would appear with the Facility in place (see **Attachment R-2 in Exhibit R**).

Section R.6.3 in Exhibit R provides a detailed analysis of the potential visual impacts of the Facility on this portion of the recreation area. **Exhibit R** also provides a series of photographs showing existing conditions of the view from the recreation area as well as photo simulations showing what the view will potentially

look like with the Facility in place (see **Figures 4a-c** in **Attachment R-2**). A map showing the photo point location where this photo was taken is included as **Figure R-2** in **Exhibit R**.

As discussed in **Section R.6.3** of **Exhibit R**, the visual quality of this area is moderately high, and viewer concern is assumed to be high given that viewers in this area are predominantly recreationists, who are assumed to have high levels of viewer concern and expectation. However, discordant visual elements including existing visible plumes from the Georgia-Pacific paper mill, as well as the BPA 500-kV Ostrander-Troutdale transmission line are also visible from this area. In addition, intervening vegetation screens almost all views of Facility structures at this location, and only the Representative Worst Case Plume is detectable. As discussed in **Section R.6.2.3** in **Exhibit R**, a plume of this size will occur extremely infrequently.

Because of the low visibility of the Facility and existing discordant visual elements, the Facility will have relatively little effect on the overall visual character and quality of views from this area. Furthermore, views of the Facility will be screened by intervening vegetation throughout the vast majority of the recreation area, including the entire trail system. Therefore, the Facility will not result in significant adverse impacts to views from the Sandy River Delta Recreation Area.

Lewis and Clark State Recreation Area

The nearest portion of the Lewis and Clark SRA is located approximately 0.6 mile east of the proposed Facility site. The viewshed analysis indicates that the Facility is potentially visible from portions of the SRA based on topography alone. Again, the viewshed analysis does not account for visual screening from vegetation. Given the dense forests surrounding the SRA and throughout the line of sight between the recreation area and the Facility, views of the Facility are not anticipated. The Applicant's visual resource specialists visited the SRA during the visual resources site visit and verified that dense vegetation screens views in the direction of the Facility from lower elevations within the SRA. Therefore, the Facility will not result in significant impacts to views from the majority of the SRA.

Views of the Facility are possible from the top of Broughton Bluff. However, human alterations encroach on this view, as evidenced by developed land in the City of Camas, Washington, existing visible plumes from the Georgia-Pacific paper mill, I-84, the City of Troutdale, the Federal Express distribution facility, and the BPA 500-kV Ostrander-Troutdale transmission line. Because of the distance of the Facility from this viewing area, its relatively small size as an element in the overall view, and the existing industrial character of much of the area seen in the view, the Facility will not have a significant adverse impact on the visual character and quality of views seen from Broughton Bluff or the Lewis and Clark SRA.

Lewis and Clark National Historic Trail

The nearest portion of the Lewis and Clark National Historic Trail is located approximately 0.6 mile southwest of the proposed Facility site. For the purpose of this analysis, the trail is separated into two segments: the segment within the Columbia River Gorge NSA and the segment in the cities of Troutdale and Fairview, outside of the Columbia River Gorge NSA. The portion of the trail within the Columbia River Gorge NSA offers by far the most scenic views, whereas views from the portion of the trail within the cities of Troutdale and Fairview are dominated by human alterations including I-84, developed land in the City of Camas, Washington, existing visible plumes from the Georgia-Pacific paper mill, high-voltage transmission lines, and the Portland-Troutdale Airport. Therefore, the visual change resulting from the Facility to views from the trail outside of the Columbia River Gorge NSA will be low.

Based on topography alone, the viewshed analysis indicates that the Facility will not be visible from the vast majority of the trail as it enters the Columbia River Gorge NSA. Again, the viewshed analysis does not account for visual screening from vegetation. Given the dense forests immediately adjacent to the trail

and throughout the line of sight between the trail and the Facility, views of the Facility are not anticipated. Furthermore, the only Point of Interest along the trail within the 5-mile analysis area is the Lewis and Clark State Recreation Area. As discussed above, the Facility will not have a significant adverse impact on views from this Point of Interest. Accordingly, the Facility will not have a significant adverse impact on views from the Lewis and Clark National Historic Trail.

Historic Columbia River Highway

The nearest portion of the Historic Columbia River Highway is approximately 1.1 mile south of the proposed Facility site. For the purpose of this analysis, the highway is separated into two segments: the segment within the Columbia River Gorge NSA and the segment in the City of Troutdale, outside of the Columbia River Gorge NSA. The portion of the highway within the Columbia River Gorge NSA offers by far the most scenic views, whereas views from the portion of the highway within the City of Troutdale are dominated by human alterations including I-84, developed land in the City of Camas, Washington, existing visible plumes from the Georgia-Pacific paper mill, high-voltage transmission lines, and the Portland-Troutdale Airport. Therefore, the visual change resulting from the Facility to views from the highway outside of the Columbia River Gorge NSA will be low.

Based on topography alone, the viewshed analysis indicates that the Facility will not be visible from the vast majority of the Historic Columbia River Highway as it enters the Columbia River Gorge NSA. Again, the viewshed analysis does not account for visual screening from vegetation. Given the dense forests immediately adjacent to the highway and throughout the line of sight between the highway and the Facility, views of the Facility are not anticipated. The Applicant's visual resource specialists drove the highway during the visual resources site visit and verified that dense vegetation screens views in the direction of the Facility. Therefore, the Facility will not result in significant impacts to views from the Historic Columbia River Highway.

Reed Island State Park

The nearest portion of Reed Island State Park is located approximately 2.7 miles east of the proposed Facility site. The viewshed analysis indicates that the Facility is potentially visible from portions of the park based on topography alone. Again, the viewshed analysis does not account for visual screening from vegetation. Given the dense forest located throughout the park and throughout the line of sight between the park and the Facility, views of the Facility are not anticipated. Dense vegetation from Gary Island, the Sandy River Delta, and the large stand of cottonwood trees in the northeast corner of Lot 3 will screen views of the Facility's structures and intermittent cooling tower plumes. Therefore, the Facility will not result in significant impacts to views from Reed Island State Park.

T.3.1.3 Important Recreational Opportunities Located Outside the Columbia River Gorge National Scenic Area

As shown in **Table T-2**, eight of the 14 important recreational opportunities identified within the 5-mile analysis area are located outside the Columbia River Gorge NSA. The following analysis evaluates visual impacts from the Facility on important recreational opportunities that lie outside the Columbia River Gorge NSA.

40-Mile Loop Trail

The 40-Mile Loop Trail is located approximately 70 feet north of the proposed Facility site, and is the recreational opportunity nearest the Facility. Given the close proximity of the trail to the Facility, views of the Facility's structures and intermittent cooling tower plumes are likely along portions of the trail. However, a large stand of cottonwood trees in the northeast corner of Lot 3 will screen views of the

Facility from portions of the trail. The Applicant designed the Facility layout with the specific intention of preserving these trees to provide visual screening to nearby viewers. The locations of the trees that will be preserved on Lot 3 are shown on **Figure K-7** in **Exhibit K**.

The Applicant's visual resource specialists confirmed that these trees present throughout Lot 3 will substantially screen views from the eastern portion of the trail located within the 5-mile analysis area (see **Figure T-1**).

A portion of the trail that is located to the west of the Facility is expected to have direct views of the Facility. Due to the proximity of the trail to the Facility, this location was selected as one of the five representative viewpoints that were used for the preparation of visual simulations showing the area as it would appear with the Facility in place (see **Attachment R-2** in **Exhibit R**).

Section R.6.3.4 in **Exhibit R** provides a detailed analysis of the potential visual impacts of the Facility on this portion of the Trail. **Exhibit R** also provides a series of photographs showing existing conditions of the view from the trail as well as photo simulations showing what the view will potentially look like with the Facility in place (see **Figures 5a-c** in **Attachment R-2**). A map showing the photo point location where this photo was taken is included as **Figure R-2** in **Exhibit R**.

As discussed in **Section R.6.3.4** of **Exhibit R**, the visual quality of this area is moderately low, and existing industrial uses dominate the landscape's foreground. Furthermore, viewer concern is assumed to be moderately low in this area as well. Viewers in this area are predominantly cyclists, joggers, or other recreationists, who are assumed to have high levels of viewer concern and expectation. However, as discussed above, this area has an industrial character and the dominant visual features include the Federal Express distribution facility and large-scale transmission line infrastructure, which presumably downgrade viewer concern in this area.

As shown on **Figures 5b** and **5c** in **Attachment R-2** of **Exhibit R**, visibility of the Facility from the trail is high. As described previously, this is the closest, least obstructed view of the Facility from an important recreational opportunity. At this location, Facility structures and the intermittent cooling tower plumes will be readily visible. The number of viewers at this location is assumed to be moderately high given the popularity of the trail. The duration of view is moderately low in length, given that majority of viewers are expected to be joggers or cyclists who will move through the area relatively fast. It is also important to note that this portion of the trail crosses land in the City of Troutdale zoned for industrial use, and even if the Facility is not constructed on Lot 3, another industrial use will be constructed in this location. Consequently, by virtue of the City of Troutdale zoning, impacts on this recreational use are assumed to be acceptable, and viewing a thriving industrial employment area is considered part of the recreational experience in this location.

Because of the area's existing industrial character, its moderately low visual quality, the moderate level of visual exposure from the trail, and the moderately low level of concern by trail users, the Facility will not result in significant adverse impacts to views from the 40-Mile Loop Trail.

Sandy River Water Trail

The nearest portion of Sandy River Water Trail is located approximately 0.1 mile northeast of the proposed Facility site. The viewshed analysis indicates that the Facility is potentially visible from portions of the trail based on topography alone. However, potential views from the portion of the trail nearest the Facility will be nearly identical to those from the shore of the Sandy River Delta Recreation Area. As discussed above, these views are characterized by moderately low visibility of the Facility and existing discordant visual elements, and the Facility will have relatively little effect on the overall visual character and quality of views from this area. Furthermore, as the trail extends farther up the Sandy River away

from the Facility, views of the Facility will be screened by intervening vegetation along the west bank of the river and throughout TRIP. Therefore, the Facility will not result in significant adverse impacts to views from the Sandy River Water Trail.

Lower Columbia River Water Trail

The nearest portion of Lower Columbia River Water Trail is located approximately 0.4 mile north of the proposed Facility site. The viewshed analysis indicates that the Facility is potentially visible from portions of the trail based on topography alone. However, vast majority of the trail within the 5-mile analysis area will be screened from view by intervening vegetation on McGuire Island, the Sandy River Delta, and Gary Island (see **Figure T-1**). Potential unobstructed views of the Facility's structures and intermittent cooling tower plumes may be possible on the trail between McGuire Island and the Sandy River Delta. However, views from this roughly 2.5-mile stretch of the trail are already dominated by human alterations including developed land in the cities of Troutdale and Camas, the Federal Express distribution center, plumes from the Georgia-Pacific paper mill, and high-voltage transmission lines. Given these existing visual alterations, the degree of visual change resulting from the Facility will be low. Therefore, the Facility will not result in significant adverse impacts to views from the Lower Columbia River Water Trail.

Blue Lake Regional Park

The nearest portion of Blue Lake Regional Park is located approximately 0.4 mile west of the proposed Facility site boundary. The portion of the Facility nearest the park is a portion of one of the transmission line routes under consideration by the Applicant (Route 1; see **Figure B-12** in **Exhibit B**). As shown on **Figure B-13** in **Exhibit B**, the transmission line poles proposed will extend to a height of up to 95 feet. Given the distance of the transmission line from the park, as well as intervening vegetation, views of the transmission line from the park are not anticipated.

The main portion of the Facility including both power plants, buildings, and cooling towers will be approximately 2.1 miles east of the park. The viewshed analysis indicates that the Facility is potentially visible from portions of the park based on topography alone. Even without topographical barriers, dense vegetation throughout the park will screen views of the Facility. Furthermore, dense residential development in the City of Fairview exists in the line of sight between the Facility and the park. This residential development, combined with the existing industrial uses surrounding the Facility will result in a low degree of visual change resulting from Facility construction and operation. Therefore, the Facility will not result in significant impacts to views from Blue Lake Regional Park.

Mount Hood Scenic Byway

The nearest portion of the Mount Hood Scenic Byway is located approximately 0.8 mile south of the proposed Facility site. The viewshed analysis indicates that the Facility has the potential to be visible from only a select few locations along the byway as it passes through the City of Wood Village. This portion of the byway is flanked on either side by dense residential and commercial developments. This roadside development dominates the views from the highway in this area and blocks views in the direction of the Facility. Because of this development and the Facility's distance from the highway, the Facility will have very limited visibility from the byway in this area, and will have little to no effect on views. Consequently, the Facility will not result in significant impacts to views from the Mount Hood Scenic Byway.

Government Island State Recreation Area

The nearest point of Government Island State Recreation Area is approximately 1.1 miles northwest of the proposed Facility site. From the docks and floating tie-up on the north side of the main island, where a majority of recreational use occurs, the viewshed analysis indicates that views toward the Facility are

primarily screened from view by topography. Furthermore, intervening vegetation on the recreation area and nearby McGuire Island will further screen views of the Facility's structures and intermittent cooling tower plumes. In the southern and western portions of the island, views of Facility structures and intermittent cooling tower plumes are more likely to occur. However, human alterations encroach on this view, as evidenced by developed land in the City of Camas, Washington, existing visible plumes from the Georgia-Pacific paper mill, the Federal Express distribution facility, and the BPA 500-kV Ostrander-Troutdale transmission line. Because of the presence of these existing visual elements, the Facility will not create a substantial change in the visual character and quality of the existing view and, thus, will not have a significant adverse impact on views from Government Island State Recreation Area.

Sandy River National Wild and Scenic River

The nearest segment of the Sandy River designated as Wild and Scenic is located approximately 2.7 miles southeast of the proposed Facility site. The viewshed analysis indicates that topographic features will block all views of the Facility. Furthermore, the Sandy River is surrounded by dense vegetation that will provide additional screening of the Facility's structures and intermittent cooling tower plumes. Therefore, the Facility will not result in significant impacts to views from the Wild and Scenic segment of the Sandy River. **Exhibit R** provides additional visual analysis of potential impacts to views from the Sandy River (see **Section R.6.3** in **Exhibit R**).

Dabney State Recreation Area

The nearest portion of the Dabney State Recreation Area is located approximately 2.8 miles southeast of the proposed Facility site. The viewshed analysis indicates that topographic features will block all views of the Facility. Furthermore, the recreation area is surrounded by dense vegetation, which will provide additional screening of the Facility's structures and intermittent cooling tower plumes. Therefore, the Facility will not result in significant impacts to views from the Dabney State Recreation Area.

T.4 MITIGATION MEASURES

OR 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: Because the Facility will not result in significant adverse impacts to important recreational opportunities, no mitigation is proposed.

T.5 MAP OF ANALYSIS AREA

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

Response: A map of the analysis area showing the locations of important recreational opportunities identified pursuant to OR 345-021-0010(1)(t)(A) is provided as **Figure T-1**.

T.6 MONITORING PROGRAM

OR 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 to important recreational opportunities have been identified and because no mitigation is required, a monitoring plan is not proposed.

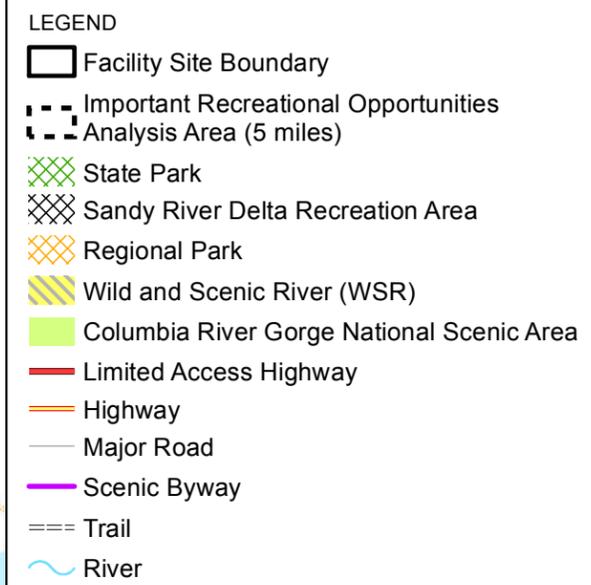
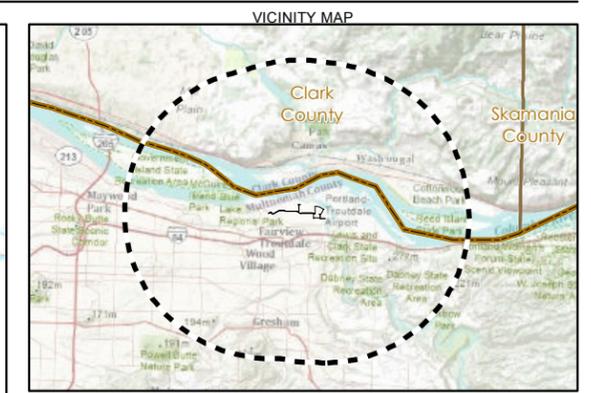
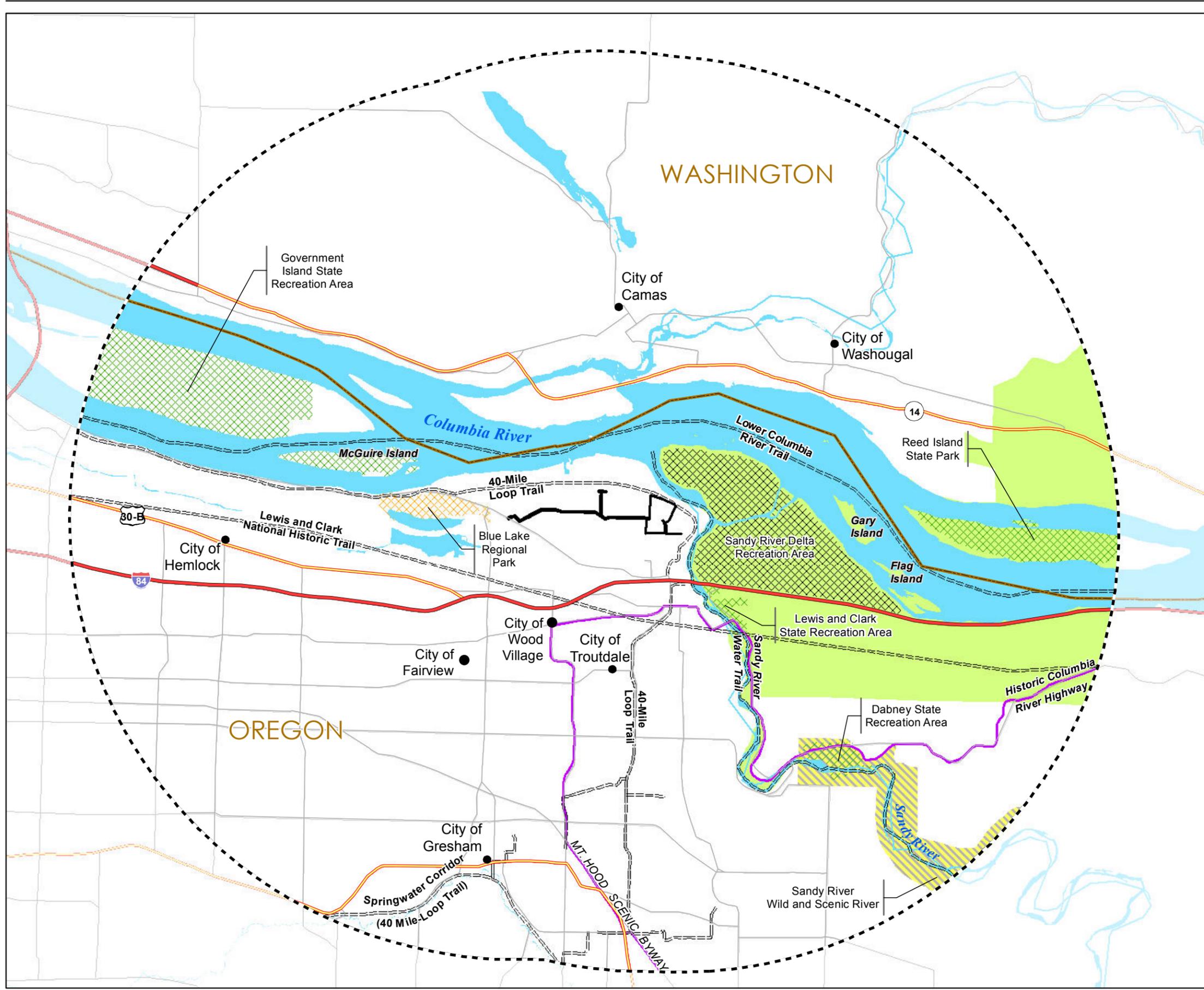
T.7 SUMMARY

The Facility will comply with all applicable regulatory guidelines concerning important recreational opportunities as discussed above in the responses to the requirements contained in OAR 345-021-0010(1)(t). On the basis of the above evidence, the Applicant has satisfied OAR 345-021-0010(1)(t), and the Council may find requirements in OAR 345-022-0100 are satisfied.

T.8 REFERENCES

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FIGURE



Data Sources:
 State Parks (OR Parks and Recreation Dept, 2011);
 WA State Parks Rec Commission, 2011)
 Columbia River National Scenic Area (US Forest Service, 2011)
 Wild and Scenic River Areas (OR/WA BLM, 2011)
 Base Features (ESRI, 2012)

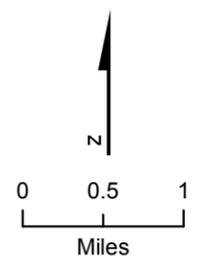


FIGURE T-1
Important Recreational Opportunities
 Troutdale Energy Center
 Application for Site Certificate

ATTACHMENT T-1

**Comprehensive List of Recreational
Opportunities**

ATTACHMENT T-1

Comprehensive List of Recreational Opportunities^a*Troutdale Energy Center, Application for Site Certificate*

Type	Name	Managed By	State	Meet OAR 345-022-0100 Criteria?
Federal Lands				
	Columbia River Gorge National Scenic Area	Columbia River Gorge Commission, U.S. Forest Service	OR/WA	Yes
	Sandy River Delta Recreation Area	US Forest Service	OR	Yes
National Historic Trails				
	Lewis and Clark National Historic Trail	National Park Service	OR/WA	Yes
Scenic Byways				
	Historic Columbia River Highway	Oregon Department of Transportation, Oregon Parks and Recreation Department	OR	Yes
	Mount Hood Scenic Byway	Oregon Department of Transportation	OR	Yes
State Parks				
	Government Island State Recreation Area	Oregon Parks and Recreation Department	OR	Yes
	Dabney State Recreation Area	Oregon Parks and Recreation Department	OR	Yes
	Lewis and Clark State Recreation Site	Oregon Parks and Recreation Department	OR	Yes
	Reed Island State Park	Washington State Parks and Recreation Commission	WA	Yes
Wild and Scenic Rivers				
	Sandy River National Wild and Scenic River	Bureau of Land Management	OR	Yes
Trails				
	Lower Columbia River Water Trail	Lower Columbia River Estuary Partnership	OR/WA	Yes
	MAX Trail	City of Gresham	OR	No
	Gresham Butte Saddle Trail	City of Gresham	OR	No
	Butler Creek Greenway	City of Gresham	OR	No
	Kelly Creek Trail	City of Gresham	OR	No
	I-84 trail	City of Gresham	OR	No
	40-Mile Loop Trail	40-Mile Loop Land Trust	OR	Yes
	Sandy River Water Trail	U.S. Bureau of Land Management, Oregon Parks and Recreation Department	OR	Yes
	Heritage Trail	City of Camas	WA	No
City Parks				
	Depot Park	City of Troutdale	OR	No
	Mayor's Square	City of Troutdale	OR	No
	Harlow House	City of Troutdale	OR	No
	Glenn Otto Park	City of Troutdale	OR	No
	Weedin Park	City of Troutdale	OR	No
	Beaver Creek Natural Area	City of Troutdale	OR	No
	Lewllyn Park	City of Troutdale	OR	No
	Sandy River Natural Area	City of Troutdale	OR	No
	Sandee Palisades	City of Troutdale	OR	No
	Sweetbriar Park	City of Troutdale	OR	No
	Mt. Hood Community College Natural Area	City of Troutdale	OR	No
	Bellingham Natural Area	City of Troutdale	OR	No
	C.P. Park	City of Troutdale	OR	No

ATTACHMENT T-1

Comprehensive List of Recreational Opportunities^a*Troutdale Energy Center, Application for Site Certificate*

Type	Name	Managed By	State	Meet OAR 345-022-0100 Criteria?
	No Name Park	City of Troutdale	OR	No
	Sunrise Park	City of Troutdale	OR	No
	Kiku Park	City of Troutdale	OR	No
	Woodale Park	City of Troutdale	OR	No
	Helen Althaus Park	City of Troutdale	OR	No
	Columbia Park	City of Troutdale	OR	No
	Stuart Ridge Natural Area	City of Troutdale	OR	No
	Cedar Neighborhood Park	City of Gresham	OR	No
	Aspen Highlands Park	City of Gresham	OR	No
	Red Sunset Park	City of Gresham	OR	No
	Main City Park	City of Gresham	OR	No
	Davis Park	City of Gresham	OR	No
	Yamhill Neighborhood Park	City of Gresham	OR	No
	North Gresham Park	City of Gresham	OR	No
	Kirk Park	City of Gresham	OR	No
	Nadaka Nature Park	City of Gresham	OR	No
	Pat Pfeifer Park	City of Gresham	OR	No
	John Deere Field	City of Gresham	OR	No
	Vance Park	City of Gresham	OR	No
	Zimmerman House Park	City of Gresham	OR	No
	Columbia View Park	City of Gresham	OR	No
	Rockwood Central Park	City of Gresham	OR	No
	North Gresham Park	City of Gresham	OR	No
	Hall Park	City of Gresham	OR	No
	Thom Park	City of Gresham	OR	No
	Southeast Community Park	City of Gresham	OR	No
	Gradin Community Sports Park	City of Gresham	OR	No
	Kane Road Park	City of Gresham	OR	No
	East Gresham Park	City of Gresham	OR	No
	Chinook Landing Marine Park	City of Fairview	OR	No
	Community Park	City of Fairview	OR	No
	Fairview Woods	City of Fairview	OR	No
	Handy Park	City of Fairview	OR	No
	Pelfrey Park	City of Fairview	OR	No
	Palish Ponds Wetland Park	City of Fairview	OR	No
	Lakeshore Park	City of Fairview	OR	No
	Park Cleone	City of Fairview	OR	No
	Donald L. Robertson Park	City of Wood Village	OR	No
	Wood Village Community Garden	City of Wood Village	OR	No
	Angelo Park	City of Washougal	WA	No
	Dick Beaver Park	City of Washougal	WA	No
	Campen Creek Park	City of Washougal	WA	No
	Eldridge Park	City of Washougal	WA	No
	Elizabeth Park	City of Washougal	WA	No
	George Schmid Memorial Park	City of Washougal	WA	No
	Hamllik Park	City of Washougal	WA	No
	Hathaway Park Upper	City of Washougal	WA	No
	Hathaway Park Lower	City of Washougal	WA	No
	Lookout Ridge Park	City of Washougal	WA	No

ATTACHMENT T-1

Comprehensive List of Recreational Opportunities^a*Troutdale Energy Center, Application for Site Certificate*

Type	Name	Managed By	State	Meet OAR 345-022-0100 Criteria?
	Main Street Pocket Park	City of Washougal	WA	No
	Oak Tree Park	City of Washougal	WA	No
	Reflection Plaza	City of Washougal	WA	No
	Riverview Park	City of Washougal	WA	No
	Sandy Swimming Hole	City of Washougal	WA	No
	Steamboat Landing Park	City of Washougal	WA	No
	Stevenson Off-Leash Dog Park	City of Washougal	WA	No
	Louis Bloch Park	City of Camas	WA	No
	Forest Home Park	City of Camas	WA	No
	Crown Park	City of Camas	WA	No
	Goot Park	City of Camas	WA	No
	Lacamas Park	City of Camas	WA	No
	Washougal River Park	City of Camas	WA	No
	Fallen Leaf Park	City of Camas	WA	No
	Grass Valley Park	City of Camas	WA	No
	Prune Hill Sport Park	City of Camas	WA	No
	Dorothy Fox Park	City of Camas	WA	No
	Heritage Park	City of Camas	WA	No
	Oak Park Neighborhood Park	City of Camas	WA	No
	Skate Park	City of Camas	WA	No
	Klickitat Park	City of Camas	WA	No
	Benton Park	City of Camas	WA	No
Golf Courses				
	Orchard Hills Golf Course	Private	WA	No
	Edgefield	Private	OR	No
	Gresham Golf Course	Private	OR	No
Regional Parks				
	Blue Lake Regional Park	Metro	OR	Yes
Marinas				
	Will Jan Moorage	Private	OR	No
	Big Eddy Marina	Private	OR	No
RV Parks				
	Portland Fairview RV Park	Private	OR	No
	Wood Village Park	Private	OR	No
	Rolling Hills Mobile Terrace and RV Park of Portland	Private	OR	No
	Sandy Riverfront RV Resort	Private	OR	No

^a Only those recreational resources within the 5-mile analysis area that meet the criteria contained in OAR 345-022-0100 are analyzed in Exhibit T.

ATTACHMENT T-2

**Summary of Recreational Importance Evaluation
for Recreational Opportunities that do not
Satisfy OAR 345-022-0100 Criteria**

ATTACHMENT T-2

Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Chinook Landing Marine Park	0.3	No special designation; managed by local jurisdiction (City of Fairview)	Moderate to high demand; other waterfront parks in analysis area	Chinook Landing Marine Park is the largest public boating facility in Oregon with six boating ramps and interpretive signage	Somewhat common as a recreational resource; existing local parks with river access in analysis area	Replaceable; other areas for waterfront access in analysis area
Lakeshore Park	0.5	No special designation; managed by local jurisdiction (City of Fairview)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Depot Park	0.8	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Mayor's Square Park	0.8	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Wood Village Park	0.8	No special designation; privately owned and operated	Moderate to low demand; other existing RV parks in analysis area	Not outstanding or unusual; similar existing RV parks in analysis area	Common; existing RV parks in analysis area	Replaceable; existing RV parks in analysis area
Pelfrey Park	0.9	No special designation; managed by local jurisdiction (City of Fairview)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Edgefield Golf Course	1.0	Designated as a national historic landmark; privately owned and operated	Moderate to high; other existing golf courses in analysis area	Golf course is part historic poor farm; existing golf courses in analysis area	Common; existing golf courses in analysis area	Replaceable; existing golf courses in analysis area
Fairview Woods	1.0	No special designation; managed by local jurisdiction (City of Fairview)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

ATTACHMENT T-2

Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Handy Park	1.0	No special designation; managed by local jurisdiction (City of Fairview)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Harlow House Park	1.0	On the National Register of Historic Places; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Farm house built in 1900, used by Troutdale Historical Society as a museum; not a conventional “park” limited recreational opportunity	Common as a “park” given limited recreational opportunity; some similar historic museums in analysis area	Replaceable as a “park” given limited recreational opportunity; some similar historic museums in analysis area
Helen Althaus Park	1.0	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Portland Fairview RV Park	1.0	No special designation; privately owned and operated	Moderate to low demand; other existing RV parks in analysis area	Not outstanding or unusual; similar existing RV parks in analysis area	Common; existing RV parks in analysis area	Replaceable; existing RV parks in analysis area
Glenn Otto Park	1.1	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Sandy Riverfront RV Resort	1.1	No special designation; privately owned and operated	Moderate to low demand; other existing RV parks in analysis area	Not outstanding or unusual; similar existing RV parks in analysis area	Common; existing RV parks in analysis area	Replaceable; existing RV parks in analysis area
Donald L. Robertson Park	1.2	No special designation; managed by local jurisdiction (City of Fairview)	Moderate demand; large number of existing local parks in analysis area	Park featuring play equipment, basketball court, open field for soccer and baseball, a nature trail, and a gazebo; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

ATTACHMENT T-2

Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Park Cleone	1.3	No special designation; managed by local jurisdiction (City of Fairview)	Moderate demand; large number of existing local parks in analysis area	Only park in Fairview with community gardens; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Wood Village Community Garden	1.3	No special designation; managed by local jurisdiction (City of Wood Village)	Moderate demand; large number of existing local parks in analysis area	25-plot community garden located at City Hall	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
I-84 trail	1.4	No special designation; managed by state (Oregon Department of Transportation)	Moderate to high demand; large number of existing trails and bike lanes in analysis area	Not outstanding or unusual; along a major highway; similar existing trails in analysis area	Common; similar existing trails in analysis area	Replaceable; large number of existing trails in analysis area
Rolling Hills Mobile Terrace and RV Park of Portland	1.4	No special designation; privately owned and operated	Moderate to low demand; other existing RV parks in analysis area	Not outstanding or unusual; similar existing RV parks in analysis area	Common; existing RV parks in analysis area	Replaceable; existing RV parks in analysis area
Weedin Park	1.4	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Big Eddy Marina	1.5	No special designation; privately owned and operated	Moderate to low demand; other existing marinas in analysis area	Not outstanding or unusual; similar existing marinas in analysis area	Common; existing marinas in analysis area	Replaceable; existing marinas in analysis area
Oak Park	1.5	No special designation; managed by local jurisdiction (City of Camas)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

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Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Columbia Park	1.6	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to high demand; large number of existing local parks in analysis area	Home of the “Imagination Station,” a large adventure playground structure, as well as a soccer field, three baseball diamonds, trails, and a concession facility	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Stuart Ridge Greenway	1.6	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Beaver Creek Greenway	1.7	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Community Park	1.7	No special designation; managed by local jurisdiction (City of Fairview)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Forest Home Park	1.7	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Kiku Park	1.7	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Salish Ponds Wetland Park	1.7	No special designation; managed by local jurisdiction (City of Fairview)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

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Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Goot Park	1.8	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Lewellyn Park	1.8	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Sunrise Park	1.8	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Louis Bloch Park	1.9	No special designation; managed by local jurisdiction (City of Camas)	Moderate to high demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Woodale Park	2.0	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual (undeveloped); similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Bellingham Natural Area	2.1	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Benton Park	2.1	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Crown Park	2.1	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

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Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
C.P. Park	2.2	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Dick Beaver Park	2.2	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to low demand; large number of existing local parks in analysis area	Features a cob gazebo, cob bench, and other natural elements; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Klickitat Park	2.2	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Sandee Palisades Park	2.2	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Skate Park	2.2	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	One of several skate parks in Clark County area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Washougal River Greenway	2.2	No special designation; managed by local jurisdiction (City of Vancouver)	Moderate to high demand (in summer); large number of existing local parks in analysis area	Linear park along Washougal River with several points of shoreline access, also includes a boat launch	Common; similar existing local parks with river access in analysis area	Somewhat replaceable; large number of existing local parks in analysis area
Will Jan Moorage	2.2	No special designation; privately owned and operated	Moderate demand; other existing marinas in analysis area	Not outstanding or unusual; similar existing marinas in analysis area	Common; existing marinas in analysis area	Replaceable; existing marinas in analysis area
John Deere Field	2.3	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	One of three full size cricket grounds in the Greater Portland Metro Area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

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Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Mt. Hood Community College Natural Area	2.3	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
No Name Park	2.3	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Reflection Plaza	2.3	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual (in an urban area); similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Angelo Park	2.4	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Elizabeth Park	2.4	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Sandy Swimming Hole	2.4	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to high demand (in summer); large number of existing local parks in analysis area	Large deck with access to swimming area; some similar existing local parks in analysis area	Somewhat common; similar existing local parks with river access in analysis area	Somewhat replaceable; large number of existing local parks and river access areas in analysis area
Davis Park	2.5	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Main Street Pocket Park	2.5	No special designation; managed by local jurisdiction (City of Vancouver)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual (small, paved park in urban Vancouver); similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

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Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Fallen Leaf Park	2.6	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Hall Park	2.6	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Kirk Park	2.6	No special designation; managed by local jurisdiction (City of Gresham)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
North Gresham Park	2.6	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Oak Tree Park	2.6	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to low demand; large number of existing local parks in analysis area	Small park in the Look Out Ridge subdivision with views of the Columbia River Gorge primarily facing east; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Stevenson Off-Leash Dog Park	2.6	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to high demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Sweetbriar Park	2.6	No special designation; managed by local jurisdiction (City of Troutdale)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

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Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Aspen Highlands Park	2.7	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Dorothy Fox Park	2.7	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Hathaway Park Lower	2.7	No special designation; managed by local jurisdiction (City of Washougal)	Moderate demand; large number of existing local parks in analysis area	Playground, picnic shelter, sports fields, and access to the Washougal River	Somewhat common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Hathaway Park Upper	2.7	No special designation; managed by local jurisdiction (City of Washougal)	Moderate demand; large number of existing local parks in analysis area	Playground, picnic shelter, sports fields, and access to the Washougal River	Somewhat common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Lookout Ridge Park	2.7	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Prune Hill Sport Park	2.7	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Red Sunset Park	2.7	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to high demand; large number of existing local parks in analysis area	14-acre park that includes a basketball court, soccer fields, softball field, tennis court, and gazebos	Common; similar existing local parks in analysis area	Somewhat replaceable; large number of existing local parks in analysis area
Gresham Golf Course	2.8	No special designation; privately owned and operated	Moderate to low demand; other existing golf courses in analysis area	Not outstanding or unusual; similar existing golf courses in analysis area	Common; existing golf courses parks in analysis area	Replaceable; existing golf courses in analysis area

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Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Zimmerman House Park	2.8	Zimmerman House is on the National Register of Historic Places; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Zimmerman Heritage Farm is on a 6-acre site with a Victorian-era farmhouse which acts as a museum; not a conventional "park" limited recreational opportunities	Somewhat common as a recreational resource; other museum amenities in analysis area	Replaceable as a recreational resource; other museum amenities in nearby area
Lacamas Park	3.0	No special designation; managed by local jurisdiction (City of Camas)	Moderate to low demand; large number of existing local parks in analysis area	311-acre park, majority is undeveloped with a trail system	Somewhat common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
MAX Trail	3.1	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to high demand; large number of existing trails in analysis area	Not outstanding or unusual; similar existing trails in analysis area	Common; similar existing trails in analysis area	Replaceable; large number of existing trails in analysis area
Nadaka Nature Park	3.1	No special designation; managed by local jurisdiction (City of Gresham)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Yamhill Neighborhood Park	3.1	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Small park with a basketball court and community garden plots	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Columbia View Park	3.2	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Orchard Hills Golf Course	3.2	No special designation; privately owned and operated	Moderate to low demand; other existing golf courses in analysis area	Not outstanding or unusual; similar existing golf courses in analysis area	Common; existing golf courses parks in analysis area	Replaceable; existing golf courses in analysis area

ATTACHMENT T-2

Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Heritage Park	3.3	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Two-lane boat launch and floating dock into the Washougal River	Somewhat common; similar existing local parks in analysis area	Somewhat replaceable; large number of existing local parks in analysis area
Heritage Trail	3.3	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing trails in analysis area	Not outstanding or unusual; along a major highway; similar existing trails in analysis area	Common; similar existing trails in analysis area	Replaceable; large number of existing trails in analysis area
Pat Pfeifer Park	3.3	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Vance Park	3.4	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to high demand; large number of existing local parks in analysis area	14.5-acre park with a children's imaginative garden, community gardening plots, and a nine-hole disc golf course	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Cedar Neighborhood Park	3.5	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Hamllik Park	3.5	No special designation; managed by local jurisdiction (City of Washougal)	Moderate demand; large number of existing local parks in analysis area	Covered picnic shelter, BBQ grills, playground, softball field, and a community garden	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Kane Road Park	3.5	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
George Schmid Memorial Ball Field	3.6	No special designation; managed by local jurisdiction (City of Washougal)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

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Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Grass Valley Park	3.6	No special designation; managed by local jurisdiction (City of Camas)	Moderate demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Rockwood Central Park	3.6	No special designation; managed by local jurisdiction (City of Gresham)	Moderate demand; large number of existing local parks in analysis area	9.4-acre park with play area, soccer field, basketball court, softball fields, and nine-hole disc golf course; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Somewhat replaceable; large number of existing local parks in analysis area
Main City Park	3.9	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to high demand; large number of existing local parks in analysis area	21-acre park that includes trails, playgrounds, a basketball court, horseshoe pits, two Little League baseball diamonds, and access to Johnson Creek	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
East Gresham Park	4.0	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Eldridge Park	4.2	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Thom Park	4.3	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Campen Creek Park	4.4	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area

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Summary of Recreational Importance Evaluation - Recreational Opportunities that do not Satisfy OAR 345-022-0100 Criteria

Recreational Opportunity	Approximate Distance from Facility (miles) ^a	OAR 345-022-0100 Criteria				
		Special Designation / Management	Degree of Demand	Outstanding / Unusual Quality	Availability / Rareness	Irreplaceability / Irretrievability
Gradin Community Sports Park	4.4	No special designation; managed by local jurisdiction (City of Gresham)	Potential for high demand but currently moderate to low demand; large number of existing local parks in analysis area	In the process of developing into a large sports complex, featuring sports fields, a skate park, and a community center; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Kelly Creek Greenway Trail	4.5	No special designation; managed by local jurisdiction (City of Gresham)	Moderate demand; large number of existing trails in analysis area	Not outstanding or unusual; similar existing trails in analysis area	Common; similar existing trails in analysis area	Replaceable; large number of existing trails in analysis area
Gresham Butte Saddle Trail	4.8	No special designation; managed by local jurisdiction (City of Gresham)	Moderate demand; large number of existing trails in analysis area	Not outstanding or unusual; similar existing trails in analysis area	Common; similar existing trails in analysis area	Replaceable; large number of existing trails in analysis area
Southeast Community Park	4.8	No special designation; managed by local jurisdiction (City of Gresham)	Moderate to low demand; large number of existing local parks in analysis area	Not outstanding or unusual; similar existing local parks in analysis area	Common; similar existing local parks in analysis area	Replaceable; large number of existing local parks in analysis area
Butler Creek Greenway Trail	5.0	No special designation; managed by local jurisdiction (City of Gresham)	Moderate demand; large number of existing trails in analysis area	Not outstanding or unusual; similar existing trails in analysis area	Common; similar existing trails in analysis area	Replaceable; large number of existing trails in analysis area
Steamboat Landing Park	5.0	No special designation; managed by local jurisdiction (City of Washougal)	Moderate to low demand year-round with moderate to high demand during summer months; large number of existing local parks in analysis area	Floating boardwalk on the Columbia River that leads to an elevated observation deck with views of the Columbia River, also several trails	Somewhat common; similar existing local parks in analysis area	Somewhat replaceable; large number of existing local parks in analysis area