3.10 LAND USE, PLANS, AND POLICIES

The proposed Umatilla Generating Project, including the power plant site, the gas pipeline, the transmission line, and the water supply and wastewater pipelines, would comply with the County of Umatilla and the City of Umatilla comprehensive plans as either permitted or conditional uses.

3.10.1 Affected Environment

3.10.1.1 Land Use Characteristics of the Project Site and Vicinity

The proposed project is located in the northwest portion of Umatilla County. Combined, the natural gas pipeline and transmission line rights-of-way span approximately 27 kilometers (17 miles) running in a north-south direction (see Figure 2.1). The power plant site is located about 5 kilometers (3 miles) southwest of the City of Hermiston and 12.1 kilometers (7.5 miles) south of the City of Umatilla. The gas pipeline right-of-way runs south from the power plant site to connect with the Gas Transmission Northwest (GTN) mainline. The transmission line right-of-way runs north from the power plant site to McNary Substation, located along the Columbia River. Generally, the area is characterized by its relatively flat terrain and agricultural land use activities. The outer boundaries of the area used to identify potential land use impacts for the proposed project are as follows:

- 0.8 kilometer (0.5 mile) from the power plant site boundary
- 0.8 kilometer (0.5 mile) from the boundaries of the rights-of-way for the water pipeline and reclaimed water pipeline, the gas pipeline, and the transmission line

Power Plant Site: The power plant site is an undeveloped, 31-hectare (77-acre) parcel in Umatilla County. The parcel is bounded by Interstate 82 (I-82) on the west and is about 1.21 kilometers (0.75 mile) north of Interstate 84 (I-84). Lamb Road is the northern boundary, the Union Pacific tracks are the southern boundary, and Westland Road is the eastern boundary of the power plant site. The proposed power plant would be fenced and would be located on approximately six hectares (15 acres) of the 31-hectare (77-acre) site.

The power plant site is essentially flat and is vegetated primarily with non-native grasses on its western portion and native vegetation on its eastern portion. A road bisects the parcel from the northeast corner to the southwest corner, and Westland Irrigation District's Westland Canal passes through the eastern half of the property.

Land uses within one-half mile of the power plant site include the following:

- The Hermiston Generating Plant, a 474-MW combustion turbine power plant immediately to the east across Westland Road
- The Lamb-Weston potato processing facility, which is also to the east across Westland Road
- Two potato storage sheds immediately south of the power plant site
- The Umatilla Chemical Depot west of I-82
- Several residences

None of these existing uses is particularly sensitive to the possible impacts of the power plant. Functionally, the power plant will operate much like existing industrial uses already present in the area. Since the number of employees present at the power plant would be relatively low, and the power plant's blowdown water would be reused for crop irrigation, the impacts normally associated with large industrial uses would not be present.

Gas Pipeline Right-of-Way: The power plant would be fueled by natural gas from the existing PG&E Gas Transmission-Northwest (PG&E GTN) pipeline that passes approximately five miles south of the project site. A new pipeline lateral would be built from the power plant site to the PG&E GTN line. The new lateral would connect to the PG&E GTN line at the same location as the existing Cascade Natural Gas (CNG) Pipeline lateral that supplies the existing Hermiston Generating Plant.

While the final pipeline right-of-way would be approximately 15 meters (50 feet) in width, the corridor for the pipeline has been set at approximately 46 meters (150 feet) in width in order to provide some flexibility during final survey and right-of-way acquisition.

Currently, there are no designs which locate any above-ground structures for the gas pipelines. The companies that supply gas to UGP would develop these gas pipeline designs. Typically, there would be one meter station and no intermediate valve between the endpoints of a gas line of this length. A meter station located at the main-line tap may encompass a 929 m^2 (10,000 ft^2) site within its fence. It may be deemed necessary for the gas company to construct an intermediate valve site on this line. If so, the typical site size for this line would be less than 37 m^2 (400 ft^2).

Three alternative pipeline routes are proposed: GTN Alternative 1, GTN Alternative 2, and the CNG Alternative. As detailed in Figures 2.9 and 3.10.1, the southernmost two-mile segment of pipeline for all three alternatives would be parallel to and immediately west of CNG's existing pipeline right-of-way that serves the Hermiston Generating Plant (corridor segment A-B). For GTN Alternative 1 and GTN Alternative 2, the pipeline

would parallel the existing CNG pipeline right-of-way. For the CNG Alternative, the pipeline would be placed within CNG's existing right-of-way.

The second segment of the pipeline from Point B to the power plant site varies for each alternative.

GTN Alternative 1

As shown in Figure 2.9, GTN Alternative 1 would extend northward from Point B through Points C, D, and F. Corridor segment B-C would cross private property (Madison Farms) for approximately 686 meters (2,250 feet) before turning northward to cross the High Line Canal and follow the Jordan Road right-of-way to Point C. Corridor segment C-D would cross private property for approximately 686 meters (2,250 feet) and then follow the Stafford Hansell Road right-of-way for approximately 229 meters (750 feet) to Point D. At Point D, the pipeline would cross under I-84 and head north on private property for approximately 838 meters (2,750 feet) to the power plant site (corridor segment D-F).

GTN Alternative 2

A second alternative, GTN Alternative 2, would follow the same alignment as GTN Alternative 1 until Jordan Road intersects with Center Street (Point A to Point C on Figure 2.9). GTN Alternative 2 would turn west at Center Street, following the undeveloped road right-of-way for approximately 793 meters (2,600 feet). The proposed route would then turn north following First Street, an undeveloped road right-of-way, for approximately 914 meters (3,000 feet) until Interstate 84 (Point E to Point D), at which point GTN Alternative 2 would follow approximately the same route as GTN Alternative 1 to the energy facility site (Point F). Although Figure 2.9 shows a slightly different route between Point D and Point F for GTN Alternative 1 and GTN Alternative 2, these segments should be considered interchangeable. The total length of GTN Alternative 2 would be approximately eight kilometers (five miles).

CNG Alternative

For the CNG Alternative, CNG would construct approximately three kilometers (two miles) of new pipeline adjacent to CNG's existing pipeline and within the CNG right-of-way along corridor segment A-B. The new pipeline "loop" would connect to the existing CNG line at Point B, thereby increasing the carrying capacity of CNG's existing pipeline to enable it to serve the proposed power plant. From Point B to the Hermiston Generating Plant, no new pipeline is required. Between the Hermiston Generating Plant and the proposed power plant site, CNG would construct a new pipeline (corridor

segment C` to F). This new pipeline would extend for approximately one-half mile and would be entirely within the Light Industrial zone.

Land uses within one-half mile of the alternative pipeline corridors are as follows:

- Two potato storage sheds immediately south of the power plant site
- The Hermiston Generating Plant, a 474-MW combustion turbine power plant
- The Lamb-Weston potato processing facility to the north of the pipeline
- Farming and agribusiness operations between the Union Pacific rail line and I-84
- Various farming and agribusiness operations, including Madison Farm, south of I-84 to the PG&E GTN line
- Residences

Transmission Line Right-of-Way: Electric power from the power plant would be delivered to the regional power grid at BPA's McNary Substation at Umatilla. This would require replacing an existing 115 kV conductor with a 230 kV conductor along approximately 18 kilometers (11 miles) of Umatilla Electric Cooperative's (UEC's) existing Westland-McNary Transmission Line (see Figure 3.10.2). A new transmission segment of up to 0.8 kilometer (0.5 mile) and up to seven new transmission towers would be constructed at the interconnection at the McNary Substation. Approximately 152 meters (500 feet) of new transmission line and up to six new towers would be built at or immediately adjacent to the proposed power plant site to connect the power plant's switchyard to the existing transmission lines north of Lamb Road. All facilities associated with the reconductoring of this line would be owned and operated by UEC as part of its system.

Reconfiguring the existing 115/230 kV line to 230/230 kV would not require an expansion of the existing transmission rights-of-way held by UEC. A new right-of-way would be required for the last half-mile of transmission line to connect the transmission line to the McNary Substation. UEC would execute easement agreements to permit extension of the right-of-way.

Existing land uses within one-half mile of the transmission line right-of-way are listed below (from south to north):

- Two potato storage sheds
- The Hermiston Generating Plant, a 474 MW combustion turbine power plant, which is immediately to the east of Westland Road
- The Lamb-Weston potato processing facility to the east of Westland Road
- The Union Pacific rail line to the south of the power plant site

- Fields and farm land along the transmission line as it moves north (with the Umatilla Chemical Depot to the west)
- Widely scattered cultivated fields and farmland as the line comes into the City of Umatilla
- A residential subdivision approximately 0.40 kilometers (0.25 miles) to the north (and across the existing BPA corridor) as the line turns to the northeast and heads toward the Umatilla River
- Fields, farmland, and widely-scattered residential lands as the line crosses the Umatilla River and turns due north to Highway 730
- Fields and farmland north of Highway 730, with I-82 to the west and additional residences within the City of Umatilla on the far side of I-82

Water Supply Pipeline Right-of-Way: The proposed power plant would be supplied with water from the Port of Umatilla's regional raw water supply pipeline, which is located one-half mile to the east of the proposed project site at the Hermiston Generating Plant site. The Port's 61-centimeter (24-inch) diameter municipal raw water line is capped off adjacent to the Hermiston Generating Plant. An 46-centimeter (18-inch) diameter lateral supplies water to the Hermiston Generating Plant. A new 46-centimeter (18-inch) diameter supply line would be built from the end of the existing 61-centimeter (24-inch) diameter line to the proposed power plant. The water line extension would be approximately 0.8 kilometer (0.5 mile) long, and would parallel the Union Pacific rail line for most of its length (Figure 3.10.1). While the final pipeline right-of-way would be approximately 15 meters (50 feet) in width, the corridor has been set at approximately 46 meters (150 feet) in width in order to provide some flexibility during final survey and right-of-way acquisition.

The pipeline would be placed underground, with the possible exception of where it crosses the Westland Irrigation District Canal. Currently, there are no designs that locate any above-ground structures for the water pipeline. The water supplier may opt to construct additional meter and valve facilities for the pipeline. However, it is not anticipated that new facilities would be needed to serve the power plant, because existing facilities are likely to be upgraded to support the new water line. In any case, construction of the pipeline and any accompanying meter or valve facilities is not expected to disrupt any surface uses within the power plant site since, the land is currently vacant.

Land uses within one-half mile of the pipeline corridor are:

- Two potato storage sheds immediately south of the power plant site
- The Hermiston Generating Plant, a 474 MW combustion turbine power plant, which is immediately north of the pipeline

- The Lamb-Weston potato processing facility to the north of the pipeline
- The Union Pacific rail line

Reclaimed Water Pipeline Right-of Way: Blowdown (reclaimed water) from the power plant site would be transported to the Hermiston Generating Plant, where it would be conveyed to Madison Farms for use as irrigation water. The Madison property is located about five kilometers (three miles) south of the proposed project site. The reclaimed water from the proposed power plant would be conveyed to Madison Farms using capacity in the Hermiston Generating Plant's existing reclaimed water pipeline.

To transport reclaimed water from the power plant site to the Hermiston Generating Plant, a pipeline approximately 0.8-kilometer (0.5-mile) long would be built in the corridor shown on Figures 2.10 and 3.10.1 (the same right-of-way as the water supply pipeline described above). Madison Farms would apply the reclaimed water to land that is currently irrigated with groundwater. The reclaimed water would be mixed with other irrigation water and used to irrigate approximately 324 hectares (800 acres) of land. As shown on Figure 3.10.3, Madison Farms would install new segments of underground irrigation pipe in order to provide reclaimed water to certain irrigation circles. The new pipeline segments are necessary to deliver the reclaimed water from the power plant to the crop circles and are therefore related or supporting facilities.

3.10.1.2 Local Comprehensive Plan Land Use Designation and Zoning

The project site is within two local jurisdictions: Umatilla County and the City of Umatilla. Described below are the comprehensive plan land use designation and zoning for each of the project components.

Power Plant Site: The power plant site is located within the jurisdiction of Umatilla County. The project area for the power plant site is dominated by industrial and agricultural uses. The power plant is within a zone intended for industrial development (see Figure 3.10.4). It has a comprehensive plan designation of Industrial and a zoning designation of Light Industrial (LI). The LI zone permits industrial uses such as warehouses, manufacturing of processed materials, machine shops, bottling works, food processing facilities, nurseries and greenhouses, grain elevators, flour mills, and other uses listed in Section 3.182, Light Industrial, of the Umatilla County Development Ordinance (UCDO).

The LI zone permits utility facilities as a conditional use (Section 3.184 of the UCDO). A conditional use is a use that may locate in certain zoning districts provided it will not be detrimental to public health and safety and will not impair the integrity of the zoned

district. The proposed power plant would be subject to conditional use criteria outlined in the UCDO [Sections 3.185, 7.050 and 7.060 (55)].

Gas Pipeline Right-of-Way: All three gas pipeline alternatives are within Umatilla County's jurisdiction. The small portion of each alternative closest to the plant would be on land with a comprehensive plan designation of Industrial and zoned LI (Light Industrial). The portion of GTN Alternative 1 between Jordan Road and I-84 (corridor segment C-D) would be adjacent to a segment of land zoned TC (Tourist Commercial), but would likely remain on land zoned EFU (Exclusive Farm Use). The portion of GTN Alternative 2 between Jordan Road and I-84 would also remain on land zoned EFU. The southern portion of the gas pipeline corridor, which all three pipeline alternatives have in common, would cross land with a comprehensive plan designation of North and South County Agricultural and zoned EFU.

Transmission Line Right-of-Way: Most of the transmission line is within the land use jurisdiction of Umatilla County. From the power plant site, approximately the first 0.8 kilometer (0.5 mile) of the transmission line to be reconductored is zoned LI, with a comprehensive plan designation of Industrial. The transmission line proceeds north along the boundary of the Umatilla Chemical Depot. For 4.0 kilometers (2.5 miles), the transmission line is on land zoned by the county EFU-40 (Exclusive Farm Use, 16-hectare [40-acre] minimum) with a comprehensive plan designation of West County Irrigation District. The right-of-way continues north and east to the urban growth boundary (UGB) of the City of Umatilla on land zoned EFU with a comprehensive plan designation of North and South County Agricultural.

Approximately 0.40 kilometers (0.25 miles) of existing right-of-way along Spud Road is within the City's urban growth area[1] and has County zoning of F1 (Exclusive Farm Use, 8 hectares [19 acres]) and a City comprehensive plan designation of SR (suburban residential). The transmission line then enters the City limits and passes through several zones.

After leaving the City at the Umatilla River, the remainder of the existing UEC transmission line right-of-way is within the urban growth area of the City of Umatilla and has the following County zoning: Fl (Exclusive Farm Use, 8 hectares [19 acres]), F2 (General Rural, 8 hectares [19 acres]), R1 (Agricultural-Residential, 2 hectares [4 acres]), and M2 (Heavy Industry). These zones predated the 1995 County

[1] Land inside the City of Umatilla's UGB but outside the city limits (i.e., in the "urban growth area") is under the County's land use jurisdiction. However, under the "Urban Growth Area Joint Management Agreement" between the county and the City of Umatilla, the County has agreed to apply the City of Umatilla comprehensive plan to land use action in this area. As a result, within the City of Umatilla's urban growth area, County zoning designations apply together with the City's comprehensive plan provisions.

Development Ordinance but were still in effect at that time. The City comprehensive plan designations are R1 (Residential, Single Family), FP (Flood Plain) where the transmission line crosses the Umatilla River; NR (Natural Resource), SR (Suburban Residential), and PF (Public Facilities).

The northern most portion of the transmission line, where new right-of-way may be required for the new transmission line on new towers, is also within the City's urban growth area on land zoned F1, with City comprehensive plan designations of PF (Public Facilities) and R-O/S (Recreation-Open Space). The southern most portion of the transmission line, where new transmission line on new towers will connect the power plant's switchyard with the existing transmission line right-of-way, would most likely be entirely within the LI zone.

Water Supply Pipeline Right-of-Way: The entire pipeline extension is within Umatilla County's jurisdiction. The pipeline would be located on land with a comprehensive plan designation of Industrial and zoned LI (Light Industrial).

Reclaimed Water Pipeline Right-of-Way: The reclaimed water pipeline between the power plant site and the Hermiston Generating Plant and the new irrigation pipeline segments on Madison Farms property are all within the jurisdiction of Umatilla County. The pipeline carrying reclaimed water from the power plant to the Hermiston Generating Plant would fall within the LI zone. Pipeline segments on Madison Farms property would be in the EFU zone.

3.10.1.3 Plans and Policies

Umatilla County and the City of Umatilla are the two local governments with land use jurisdiction over the site. Both have acknowledged comprehensive plans and zoning ordinances. The power plant and portions of the related or supporting facilities are considered conditional uses and therefore subject to review under both comprehensive plans. The power plant will comply with all applicable local and state land use regulations. No federal land use management plan is applicable to the power plant or the site.

The power plant is located outside of agriculturally designated areas and is not on land currently in farm use. Portions of the reconductored transmission line and the gas pipeline, as well as the new segments of irrigation pipeline installed at Madison Farms, would be located on EFU lands currently in farm use. The power plant and its related or supporting facilities would not interfere with accepted farming practices or increase the cost of farming operations within the project area.

3.10.1.4 Consistency with Local Comprehensive Plan Land Use Designation and Zoning

The proposed project components would be consistent with the Umatilla County and City of Umatilla comprehensive plan land use designations for all components of the project. Construction of the power plant and portions of the related or supporting facilities would require conditional use permits. The Umatilla Generating Company, L.P. has applied for these conditional use permits through the Energy Facility Siting Council. The permit would have to be approved before construction could begin.

Power Plant Site: Construction of the power plant would be in conformance with all applicable conditional use criteria.

Gas Pipeline Right-of-Way: For the GTN Alternatives 1 and 2, construction of the short south-to-north segment of the pipeline in the LI zone would be in conformance with the applicable conditional use criteria. The same is true for the short east-to-west segment of pipeline in the LI zone that would be constructed for the CNG Alternative. Otherwise, the pipeline would be a permitted use.

Transmission Line Right-of-Way: Replacement of the transmission line would be in conformance with applicable conditional use criteria where the line is not a permitted use. The same would be true for the short segments of new transmission line on new towers.

Water Supply and Reclaimed Water Pipeline Right-of-Way: Construction of the short water pipeline segments would be in conformance with conditional use criteria for the segments in the LI zone and permitted for segments in the EFU zone.

3.10.1.5 Conformance with Plans and Policies

The following Umatilla County Comprehensive Plan Policies are applicable to the proposed power plant and its related or supporting natural gas pipeline, water supply pipeline, reclaimed water pipeline, and the reconductoring of UEC's Westland-McNary Transmission Line. In addition, compliance with each policy is addressed below.

Economic Policies:

1. **Encourage diversification within existing and potential resource-based industries.**

The power plant represents a substantial increase in the energy resource base of Umatilla County. The infrastructure being developed for the power plant would serve as a long-term asset to encourage additional development of a diversity of industry in the county.

7. Cooperate with development-oriented entities in promoting advantageous aspects of the area.

The power plant relies on the area's comparative advantages in availability of labor, reasonably priced land, access to energy sources, and excellent transportation access. The Umatilla Generating Company, L.P. has worked closely with development-oriented entities in promoting the development of infrastructure for future municipal and industrial growth in the region, including the construction of the Port of Umatilla's regional water supply.

8. Evaluate economic development proposals upon the following: will the proposal: (a) increase or decrease available [water] supplies; (b) improve or degrade [water] qualities; (c) balance [water] withdrawal with recharge rates; (d) be a beneficial use; (e) have sufficient quantities available to meet needs of the proposed project and other existing and reasonably anticipated needs; and (f) reduce other opportunities and, if so, will the loss be compensated by other equal opportunities?

This policy implements the comprehensive plan finding that "[w]ater availabilities are a key resource to future economic growth." The proposed power plant is strongly supportive of the water quality and quantity components of this economic development policy. It would be served by the Port of Umatilla's regional water supply system. The initial design and construction capacity of the Port's water system was set specifically to supply water for this power plant, as the result of an early contractual commitment made by the Umatilla Generating Company, L.P. to fund a major share of the system's initial development cost. In accordance with the terms of the agreement executed by the Port of Umatilla and other users, First Oregon Land Corporation, an affiliate of Umatilla Generating Company, L.P. has a contractual right to 14,157.44 m^3/day (3.74 million gallons per day [MGD]) of water from the Port's system. First Oregon Land Corporation is prepared to assign its rights and obligations under its contract with the Port to Umatilla Generating Company, L.P.

Peak average water demand for the power plant would be approximately 14,081.73 m^3/day (3.72 MGD). Average annual water demand would be approximately 12,529.71 m^3/day (3.31 MGD). The power plant is designed to minimize the use of water per unit of electrical power generated. The use of a high efficiency gas turbine as the primary mode of power for the electric generators requires one-quarter to one-third of the water required by conventional steam boilers. In addition, a number of water-saving features would be built into the project. Chapter 2 details the measures that would be employed to reduce the consumption of water. A recirculating cooling system employing mechanically induced draft evaporative cooling towers would be used to minimize water consumption.

Blowdown, which is the water bled from the cooling system to limit the buildup of total dissolved solids (TDS), would be re-used at Madison Farms for crop irrigation. Storm water from roofs and paved areas would be collected and discharged to a detention basin. Storm water from the area of the power block would be collected separately from the rest of the power plant site and processed by an oil/water separator. It would then be discharged into the cooling tower basin, where it would be used for cooling water make-up.

An amendment to the Hermiston Generating Plant's Water Pollution Control Facility (WPCF) permit is required for land application of reclaimed water from the power plant. Reclaimed water would be conveyed to Madison Farms via Hermiston Generating Plant's existing direct reclaimed water pipeline. The amended WPCF permit would regulate the land application of the reclaimed water to ensure that the water quality of the area is maintained.

A NPDES Stormwater Discharge General Permit is required to address erosion control for construction activity. An Erosion and Sediment Control Plan would be prepared as a part of the application for the Stormwater Permit. The terms of the permit would regulate construction activity on-site to limit erosion and maintain water quality. In addition, the mitigation plan described in Section 3.1 sets forth the mitigation measures that would be employed to mitigate any potential impacts to water quality from construction activities.

10. Encourage industry and manufacturing diversification while preserving the more productive agricultural lands.

The proposed power plant would add approximately 10 full-time, year-round jobs to the County's economy, helping to offset seasonal unemployment and underemployment and to diversify the employment base. This would be done on non-agricultural lands. As a new source of employment and community infrastructure, the proposed power plant directly supports this policy.

13. Provide for two types of industrial classification: light industry with less offensive odors and likely compatibility with commercial uses; and heavy industry which may generate noise, offensive odors, vehicular traffic, or require large amounts of energy and require isolation from people-oriented land uses.

This comprehensive plan policy does not require the County to find that a use within the light industrial classification is compatible with heavy industrial uses. Rather, it requires the county to provide for light industrial and heavy industrial zoning classifications, and the light industrial zoning provisions must ensure that the light industrial uses are

compatible with commercial uses. The power plant is compatible with both industrial and commercial uses.

The power plant and its related or supporting facilities are classified as "utility facilities" by the Umatilla County Development Ordinance and are permitted as conditional uses in the Light Industrial zone. As required by this comprehensive plan policy, the County created the LI zone to accommodate light industrial uses that produce less offensive impacts and are compatible with adjacent commercial uses.

As discussed in Section 3.11.2, the power plant would be compatible with nearby commercial uses. Noise generated by the power plant would be within applicable Oregon DEQ limits (see Section 3.7), and no offensive odors would result from operation. Traffic generated (see Section 3.8) by approximately 10 employees would be quite low and well within the capacity of surrounding streets. There is no health or safety reason to isolate the proposed power plant from other industrial or commercial uses. In addition, the power plant would not adversely impact existing industrial uses in the surrounding area. Existing industrial uses include another power plant, a potato processing plant, railroad tracks, and warehouses. The power plant is not sensitive to existing levels of noise, dust, vibrations, and odors produced by the adjacent industrial facilities.

Similarly, the portions of the gas pipeline, the water pipeline extension, the reclaimed water pipeline, and the transmission line reconductoring within the Light Industrial zone would also be compatible with nearby commercial and industrial uses. Because they will be buried, the gas pipeline, water pipeline extension, and reclaimed water pipeline are very low-intensity industrial uses in terms of their potential for conflicts with adjacent industrial and commercial uses. The practical effect of the transmission line reconductoring on surrounding uses is that one set of conductors on the existing UEC Westland-McNary Transmission Line would be replaced with another. A minimal number of new towers would be erected on the power plant site and at the McNary Substation. The project facilities would not displace or disturb any existing use and would be located in an area with other utility lines. The project facilities would not be sensitive to existing levels of noise, dust, vibrations, and odors produced by adjacent industrial facilities, nor would the facilities create noise, dust, vibrations, or odors that could potentially conflict with adjacent commercial or industrial uses.

Agriculture Policies

As noted above, the power plant is located outside of agriculturally designated areas and is not on land currently in farm use. Portions of the reconductored transmission line and the gas pipeline, as well as the new segments of irrigation pipeline installed at Madison Farms, would be located on EFU lands currently in farm use. The information presented in the Section 3.4 of this document provides evidence that the power plant and its related

or supporting facilities would not interfere with accepted farming practices or increase the cost of farming operations within the project area.

Current agricultural operations on the EFU lands through which the gas pipeline would pass include irrigated pastures and row crops. Dominant vegetation in the pastures may include non-native grasses and a variety of weedy species such as cheatgrass, tarweed, fiddleneck, tumblemustard, and wooly sunflower. Crops grown on circles through which the pipeline may pass vary from year to year. Typical row crops are soybeans, safflower, mustard, corn, and potatoes.

CNG's pipeline was constructed in 1995, and the irrigation circles beside which it passes are currently productive. Similarly, after the new pipeline is installed adjacent to the existing CNG pipeline, the overlying soils would be restored according to the mitigation plan described in Section 3.1 to ensure that the subsurface pipeline would have no negative impacts on the current agricultural operations. The pipeline would be buried at a depth of at least 1.5 meters (5.0 feet). Crops grown on irrigation circles are compatible with underground pipelines.

Open Space, Scenic and Historic Areas, and Natural Resources Policies:

There are no inventoried significant open space, scenic, historic, or natural resource areas in the vicinity of the power plant. The only resource inventoried as significant within the impact area is the Westland School, which burned down in the late 1980s. There is no riparian vegetation on site. Section 3.9 further addresses the scenic impacts of the power plant.

1. Open Space

There is no conflict between the power plant and open space areas. The County's Goal 5 element recognizes that Umatilla County is predominantly open space. While the County has not designated specific open space areas as significant resources, the County has adopted a policy of limiting development mainly to existing built up areas. The power plant is consistent with this policy because it would be constructed adjacent to existing light industrial developments, including the Hermiston Generating Plant, a potato processing plant, railroad tracks, and warehouses. In addition, the power plant would be located at the intersection of two major highways, I-84 and I-82. Although the transmission line, the gas pipeline, and the reclaimed water lines would cross agricultural lands, the facilities would not negatively impact the open space resource. Rather than establishing a new transmission line corridor, Umatilla Generating Company, L.P. proposes to reconductor an existing transmission line. A maximum of thirteen new transmission towers would be constructed, and the new towers would be located at the McNary Substation and the power plant site, both currently developed areas. The gas

pipeline and the reclaimed water lines would not interfere with open space areas because they are subsurface facilities.

2. Natural Areas

No conflicts with significant natural areas would occur. The Westland Irrigation District's Westland Canal, on the eastern portion of the power plant site, is listed in the National Wetlands Inventory. However, the canal would not be disturbed because no power plant construction is proposed in its vicinity. The water and reclaimed water pipelines would either cross under the canal or over the canal near the Westland Road bridge and would be constructed so as to avoid impacts to wetlands. If areas of plant or animal habitat are affected, mitigation would be provided as described in Section 3.4.

3. Groundwater Resources

The County's Goal 5 inventory indicates that groundwater tables are decreasing and the County is subject to extremes in surface water availability. The power plant would not require a new state-administered water right, water right transfer, or surface water or groundwater permit.

Umatilla Generating Company, L.P. proposes to obtain water from the Port of Umatilla's Regional Water supply system. The Port built its water supply system in 1995. The source of the water is the Columbia River. Most of the funding for the project was provided by a group of water users, including First Oregon Land Corporation (an affiliate of the Umatilla Generating Company, L.P.), the City of Hermiston, J.R. Simplot, Lamb-Weston, Inc., and the Hermiston Generating Company. In accordance with the terms of the agreement executed by the Port of Umatilla and other users, First Oregon Land Corporation has a contractual right to 14,157.44 m^3/day (3.74 MGD) of water from the Port's system. First Oregon Land Corporation is prepared to assign to the Umatilla Generating Company, L.P. its rights and obligations under its contract with the Port of Umatilla..

The power plant is designed to minimize the use of water per unit of electrical power generated. The use of a high efficiency gas turbine as the primary motive power for the electric generators requires one-quarter to one-third of the water required by conventional steam boilers. In addition, a number of water-saving features would be built into the project, and the power plant would recycle its blowdown for irrigation of farmland at Madison Farms.

4. Historic and Cultural Resources

As discussed in Section 3.10, no significant historic or cultural areas have been identified at the power plant site or along the corridors of the related and supporting facilities. Policy 26 of the County's Open Space, Scenic and Historic Areas, and Natural Resources Comprehensive Plan element calls for the County to "cooperate with the [Umatilla] Tribe, Oregon State Historic Preservation Office, and others involved in identifying and protecting Indian cultural areas and archeological sites." In accordance with this policy, the County would refer the Application for Site Certificate to the Confederated Tribes of the Umatilla Indian Reservation ("CTUIR") and the State Historic Preservation Office for further consultation, and Umatilla Generating Company, L.P. would continue to consult with all of these entities. Additional consultation with the CTUIR would occur prior to and during construction of the power plant.

5. Mineral and Aggregate Resources

The County's Goal 5 inventory in effect in 1995 states that no minerals of commercial value are known to exist in the County. Although aggregate resources are common within the County, there are no inventoried aggregate resources within the impact area for the power plant. The power plant, including all related or supporting facilities, is not within the County's Aggregate Resource Overlay Zone.

6. Energy Resources

The County's Goal 5 Inventory for Energy Resources recognizes that one of the three major commercial components of Oregon's energy supply is generated within the County: electricity. As of the 1995 comprehensive plan, the County had not completed its inventory of oil, gas, and other subsurface energy resources. The power plant, a 550-MW combustion turbine/combined cycle electric facility, would enhance the electric generating capacity within the County. The power plant would be fueled by natural gas from the existing PG&E GTN pipeline that passes approximately five miles south of the power plant site. The power plant would deliver electric power to the regional power grid at the Bonneville Power Administration's McNary substation in the City of Umatilla urban growth area using UEC's existing transmission lines. The reconductoring of the existing lines would increase the overall efficiency and reliability of the transmission lines.

Air, Land and Water Quality Policies

The following policies from Chapter IX of the County's Comprehensive Plan are relevant to the proposed power plant:

1. Discharges from existing and future developments shall not exceed applicable federal and state environmental quality standards.

7. Consider cumulative noise impacts and compatibility of future developments, including the adoption of appropriate mitigating requirements of plan updates.

The power plant has been designed with the Best Available Control Technology to maintain air emissions within state and federal air quality standards. Cooling water would be treated and reused beneficially for irrigation. Impacts to wildlife are assessed in Section 3.4.

The power plant would comply with state noise regulations. Noise levels at the surrounding land uses resulting from operation of the power plant would comply with DEQ noise rules as detailed in Section 3.7. The power plant would be compatible with existing land uses because the area surrounding the plant is already occupied by other industries. It would be compatible with planned future uses because the area is zoned for industrial use.

Natural Hazards Policies

The power plant is located outside of the designated floodway and floodplain boundaries of the Umatilla River. Seismic issues are addressed in Section 3.1, and the power plant's design takes into account potential earthquake hazards. As described above, the 77-acre site is generally level and has no slopes exceeding 25 percent. The laterals for the power plant are all located within existing utility corridors and are not subject to natural hazards.

Public Facilities Policies

19. Where feasible, all utility lines and facilities shall be located on or adjacent to existing public or private rights-of-way so as to avoid dividing existing farm or forest units; and transmission lines should be located within existing corridors as much as possible.

This Policy implements the county's findings that "[u]tility facilities can remove valuable resource lands and create development problems for new developments and detract from existing development."

The power plant is consistent with this Policy. Each component of the power plant was designed to utilize existing rights-of-way when possible, to avoid dividing existing farm

and forest units, and to utilize existing transmission line and pipeline corridors when possible. Each component is addressed separately below.

Transportation Policies

> **20. The county will review right-of-way acquisitions and proposals for transmission lines and pipelines so as to minimize adverse impacts on the community.**

Routes for the gas pipeline, the water supply pipeline, the reclaimed water pipeline, and the reconductored transmission line were designed in a manner that reduces impacts on farm and forest land and existing development. Where feasible, Umatilla Generating Company, L.P. proposes to utilize existing utility facilities, rights-of-way, and pipeline and transmission line corridors to minimize impacts on the surrounding community.

In addition, each related and supporting facility is subject to review according to the conditional use standards of the Umatilla County Development Ordinance. These standards regulate the placement and design of the facilities to minimize impacts on surrounding uses. Compliance is demonstrated with all relevant standards in this section.

For the foregoing reasons, the power plant complies with Umatilla County's comprehensive plan.

According to the City of Umatilla comprehensive plan, the plan is not intended to govern specific development requests. (Comprehensive Plan, at 59.) The City comprehensive plan is implemented, for purposes of reviewing specific development proposals, through the zoning code provisions addressed above. (Comprehensive Plan, at 57.) Nevertheless to assure a complete analysis of all possible issues, the following analysis addresses those Goals and Policies of the City comprehensive plan that may be relevant to the proposed power plant.

Land Use Element: The following two policies may be relevant to the proposed transmission line reconductoring:

> **"Development proposals will be required to conform to the City's Zoning and Subdivision Ordinance."**
>
> **"The comprehensive plan will designate types of developable areas that will be derived from primary and secondary categories of development suitability." (Comprehensive Plan at 9.)**

As addressed above, the upgrading of the UEC transmission line conforms to the City's Zoning Ordinance. No land division is required for the upgrade. The transmission line is located on lands designated as developable in the comprehensive plan.

3.10.2 Environmental Consequences and Mitigation Measures

The proposed power plant, gas pipeline, transmission line, water supply pipeline and reclaimed water pipeline would comply with the County of Umatilla and City of Umatilla comprehensive plans as either permitted or conditional uses.

Impact 3.10.1 Construction of the proposed project would result in land use changes.

The proposed project would involve constructing a power plant on six hectares (15 acres) of a 31-hectare (77-acre) parcel, which is currently undeveloped. Construction of an approximately eight-kilometer (five-mile) natural gas pipeline south of the power plant site would temporarily disturb about 12 hectares (30 acres) of mostly agricultural land. The existing transmission line corridor is approximately 18 kilometers (11 miles) long and would be reconductored. There would be very little disturbance of existing land uses in and around the transmission line right-of-way during the upgrade of the transmission line or operation of the project.

Recommended Mitigation Measures No measures beyond those included in the proposed project are recommended.

Impact 3.10.2 Land Use Compatibility Issues – Intensification of Industrial Activity

Construction of the power plant on the existing undeveloped site would introduce another industrial facility within an area that currently contains a power plant directly across the street from the proposed project site, a potato processing plant, cold storage plant, a chemical incinerator, railroad tracks, warehouses, animal stockyards, agricultural activities, and rural residences. Generally, the project would result in the intensification of industrial activity in an area that is designated for that use. During construction, the project would result in minor, short-term increases in noise, dust, and traffic; however, these effects are not considered significant (see Sections 3.6 Air Quality, 3.7 Noise, and 3.8 Traffic and Circulation). During operation, the plant, with mitigation, is not expected to result in land use incompatibilities. It would not cause significant land use conflicts with nearby uses nor would it be adversely affected by operations associated with these uses. The potential land use impacts of each project component are discussed below.

Power Plant Site: The impacts from the power plant would be different during operation and construction.

Operation
The power plant would not generate significant increases in dust or vibration that could adversely affect nearby land uses. The project would not increase noise above permitted levels at the nearest sensitive noise receptors (see Figure 3.13.1).

Site reconnaissance shows the proposed power plant would be most visible at distances within 3.2 kilometers (two miles) of its site. At distances greater than two miles, the power plant would be in the background, blend with other similar features in the area and be too distant to constitute a significant feature in the viewshed (See Section 3.9).

Access to the power plant would use a public right-of-way that follows the existing road alignment through the power plant site and intersects Lamb Road approximately 183 meters (600 feet) west of its intersection with Westland Road. Project access is not expected to cause safety hazards.

Project operation would not result in significant land use conflicts with nearby uses.

Construction
During construction, 400 construction workers would be present on the project site. Construction activities associated with building the power plant would temporarily increase noise, dust, and traffic at the plant site. Construction impacts are not expected to result in significant land use impacts.

Recommended Mitigation Measures No measures beyond those included in the proposed project are recommended.

Gas Pipeline Right-of-Way: The gas pipeline would have impacts to land use only during construction. During that period, there would be increases in noise, dust, and traffic. The pipeline would be placed underground. Construction of the preferred pipeline route may temporarily remove approximately 12 hectares (30 acres) of land from agricultural use, depending on the season in which construction occurs. Construction of the pipeline is expected to take three to four months. Once construction is completed, the pipeline would be covered and agricultural lands could be returned to production. Standard construction of the pipeline would not adversely affect nearby land uses nor would it affect the overall land use pattern of the area. Construction of the pipeline would not result in significant land use impact

Recommended Mitigation Measures No measures beyond those included in the proposed project are recommended.

Transmission Line Right-of-Way: Impacts as a result of reconductoring the transmission line would be very different from operational impacts.

Operation

The proposed transmission line corridor would require replacement of the existing 115 kV circuit with a 230 kV circuit. In addition, a short segment from the power plant switchyard to Lamb Road and an approximately 0.8-kilometer (0.5-mile) segment at the north end near McNary Substation would require new transmission line on new towers. The corridor would remain in use for transmission of electricity on power lines.

Construction

During construction, noise, dust, and traffic would temporarily increase as the new power line is installed along the 18-kilometer (11-mile) corridor. Adjacent lands are primarily used for agricultural purposes. Construction of the new towers and reconductoring of existing towers is not expected to cause significant land use impacts, because there would be very little surface disturbance and construction would occur during daylight hours.

Recommended Mitigation Measures No measures beyond those included in the proposed project are recommended.

Water Supply and Reclaimed Water Pipeline Rights-of-Way: The water supply and reclaimed water pipelines would impact land use only during construction. During that period, there would be increases in noise, dust, and traffic. The water pipelines would be buried, so there would be no visual effect requiring landscaping nor any need for fencing the surface area.

The reclaimed water pipeline segments would not conflict with farm uses, as described in more detail below. To the contrary, the pipeline would provide reclaimed water for irrigation of adjacent agricultural uses. Agricultural lands would temporarily be removed from their present use for construction of the reclaimed water pipeline segments.

Construction of the water supply and reclaimed water pipelines would not result in significant land use impacts.

Recommended Mitigation Measures No measures beyond those included in the proposed project are recommended.

3.10.3 Cumulative Impacts

The proposed project would be consistent with current land use plans and policies and consequently would have no adverse effect on land use, either individually or, cumulatively with other similar existing and future facilities.