



In Reply To:
2860(084)

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Salem District Office
1717 Fabry Road S.E.
Salem, Oregon 97306
<http://www.or.blm.gov/salem/>



February 1, 2006

Dear Interested Party:

Clackamas County has applied to the Bureau of Land Management (BLM) for a Communications Use Lease to construct and operate a telecommunications facility on BLM-administered lands in an effort to greatly improve county communication systems for emergency services (police, fire, and rescue). The proposed telecommunications project is located in Township 2 South, Range 6 East, Section 14, Willamette Meridian, approximately 1.5 miles north of U.S. Highway 26 and the Brightwood area.

The environmental analysis for this project is documented in the *Clackamas County Communication Use Lease Environmental Assessment and Finding of No Significant Impact* (EA) (EA # OR080-05-13), and this document is enclosed for your review. This EA discloses the predicted environmental effects of the proposed action, one action alternative, and the no action alternative. The Proposed Action is for the BLM to issue a Communications Use Lease that would authorize Clackamas County to construct a telecommunications facility that consists primarily of a 70-foot-tall lattice-type telecommunications tower, an equipment shelter at the base of the tower, and surrounding fenced compound. The tower and supporting infrastructure would require a 3,520-square fenced compound and would be accessed by an existing road.

Written comments on the EA will be accepted between February 8th through March 9th, 2006.¹ Please address any written/email comments to the attention of Cindy Enstrom and send them to the address shown above or email them to salem_mail@blm.gov. A Decision Record will be issued shortly thereafter. If you have any questions about the project, please contact Laura Dowlan at 503-315-5908 or via email to Laura_Dowlan@blm.gov.

Sincerely,

Cindy Enstrom, Field Manager
Cascades Resource Area

Enclosure (1): *Clackamas County Communication Use Lease Environmental Assessment and Finding of No Significant Impact*

¹ Please note that all public comments, including names and street addresses of respondents, will be available for public review at the above address during regular business hours (7:30 a.m. to 4:00 p.m.), Monday through Friday, except holidays, [and may be published as part of the EA or related correspondence]. Individual respondents may request confidentiality. If you wish to withhold your name or street address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your written comment. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

-----This Page is Intentionally Left Blank-----

Clackamas County Communication Use Lease

ENVIRONMENTAL ASSESSMENT and FINDING OF NO SIGNIFICANT IMPACT

Environmental Assessment Number OR-080-05-13

January 2006

Prepared by:

Amanda J. Baxter, Regulatory Project Manager



**1881 Campus Commons Drive, St. 105
Reston, Virginia 20191**

Responsible Agency:

USDI Bureau of Land Management
Oregon State Office
Salem District
Cascades Resource Area
Marion County, Oregon

Responsible Official:

Cindy Enstrom, Field Manager
Cascades Resource Area
1717 Fabry Road SE
Salem, OR 97306

For further information, contact:

Laura Dowlan, Outdoor Recreation Planner
BLM Salem District
1717 Fabry Road SE
Salem, OR 97306
503-315-5908

Abstract: Clackamas County has applied to the Bureau of Land Management (BLM) for a Communications Use Lease to construct and operate a telecommunications facility on BLM-administered lands in an effort to greatly improve county communication systems for emergency services (police, fire, and rescue). The proposed telecommunications project is located in Township 2 South, Range 6 East, Section 14, Willamette Meridian, (Latitude 45.397444 and Longitude -122.040000) approximately 1.5 miles north of U.S. Highway 26 and the Brightwood area. This environmental assessment discloses the predicted environmental effects of three alternatives: the Proposed Action (with lattice tower), one action alternative (with monopole tree tower), and the No Action alternative. The Proposed Action is for BLM to issue a communication use lease that would authorize Clackamas County to construct a telecommunications facility that consists primarily of a 70-foot tall lattice-type telecommunications tower, an equipment shelter at the base of the tower, and a surrounding fenced compound. The tower and supporting infrastructure would require a 3,520-square fenced compound and would be accessed by an existing road. In the Action Alternative, the telecommunications tower would be a monopole disguised to look like a tree.

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

INTRODUCTION

Eyak Technology, LLC (EyakTek) has conducted an environmental analysis (Environmental Assessment #OR-080-05-13) for the Bureau of Land Management (BLM) to issue a Communications Use Lease to Clackamas County for the construction of a telecommunications facility that consists primarily of a 70-foot-tall lattice-type telecommunications tower, an equipment shelter at the base of the tower, and surrounding fenced compound. The proposed telecommunications facility is located in Township 2 South, Range 6 East, Section 14, Willamette Meridian, (Latitude 45.397444 and Longitude -122.040000) approximately 1.5 miles north of U.S. Highway 26 and the Brightwood area in Clackamas County, Oregon. Construction of the telecommunications tower and installation of the associated equipment would be used to support Clackamas County for emergency service purposes (police, fire, and rescue) (EA section 1.2).

The *Clackamas County Communication Use Lease Environmental Assessment (EA)* documents the environmental analysis of the proposed project. The EA is attached to and incorporated by reference in this Finding of No Significant Impact determination (**FONSI**). The analysis in this EA is site-specific and supplements analyses found in the *Salem District Proposed Resource Management Plan/Final Environmental Impact Statement*, September 1994 (**RMP/FEIS**) (see EA Section 1.3, *Conformance with Land use Plans, Policies, and Programs*). The proposed project has been designed to be in compliance with the direction described in EA Section 1.3.


The EA and FONSI will be made available for public review from February 8, 2006 through March 9, 2006. This document will be available at the BLM's Salem District Office and posted on the Internet at <http://www.eyaktek.com/casestudies/ClackamasCoCommLease-EADocument.pdf>. The notice for public comment will be published in a legal notice in The Sandy Post and posted on the website shown above. Comments received by the Salem District Office, 1717 Fabry Road SE, Oregon 97306, on or before March 9, 2006 will be considered in making the final decisions for this project.

FINDING OF NO SIGNIFICANT IMPACT

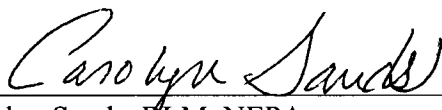
Based upon review of the EA and supporting documents, I have determined that the proposed project is not a major federal action and would not significantly affect the quality of the human environment, neither individually nor cumulatively, in regards to other actions in the general area. As defined in 40 CFR 1508.27, no environmental effects meet the definition of significance when considering both context and intensity. There are no significant impacts not already adequately analyzed, or no significant impacts beyond those already analyzed, in the *Salem District Proposed Resource Management Plan/Final Environmental Impact Statement*, September 1994 (RMP/FEIS) to which this environmental assessment is tiered. Therefore, supplemental or additional information to the analysis in the RMP/FEIS in the form of a new environmental impact statement (**EIS**) is not needed. This finding is based on the following discussion:

1. The following resources are affected by this project: visual resources and special areas outside ACECs (Mt. Hood Corridor), soils, vegetation-forest environment, and public safety (*see EA Sections 3.1- 3.4, Affected Environment and Environmental Effects*). The proposed project is unlikely to have significant impacts on these resources [40 CFR 1508.27(b) (1)] for the following reasons:
 - a. Visual Resources and Special Areas outside ACECs (Mt. Hood Corridor): The proposed project is unlikely to result to changes to the existing character of the landscape that would draw the attention of observers from key observation areas (EA section 3.1).
 - b. Soils and Vegetation–forest environment: The proposed project would require minimal disturbance to the soil (20-foot by 20-foot mat foundation, approximately 4 feet deep) and the remaining site construction would consist of regrading and compaction of the existing on-site soils. Furthermore, no trees would be removed during construction; however, the trees adjacently southwest of the tower that rise above 25 feet of the overall tower height would be trimmed to maintain a height no greater than 25 feet above the ground surface at the tower location to allow microwave transmission (EA section 2.2).
 - c. Public health or safety [40 CFR 1508.27(b) (2)] (EA section 3.4): The proposed project would affect public health and safety by providing reliable radio frequency coverage to police, fire, and rescue departments along the U.S. Highway 26 corridor and outlying areas. These areas currently lack reliable communication technology and are required to use multiple radios for communication in emergency situations. Notably, the no action alternative would affect public health and/or safety as the technology would not be implemented; therefore, causing communication failures for emergency service providers, subsequently at the cost of public safety.
2. Construction of the proposed telecommunications facility, as described in EA section 2.0, would not affect:
 - a. Unique characteristics of the geographic area [40 CFR 1508.27(b)(3)] such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas EA Chapter 6 – Environmental Elements Review).
 - b. Districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places (NRHP). The proposed project would not cause loss or destruction of significant scientific, cultural, or historic resources [40 CFR 1508.27(b)(8)];
 - c. Other resources listed in EA Chapter 6 – Environmental Elements Review.
3. The proposed action is neither unique nor unusual. BLM has implemented similar actions without the outcome being highly controversial [40 CFR 1508.27(b)(4)], highly uncertain, or unique or unknown risks [40 CFR 1508.27(b)(5)].

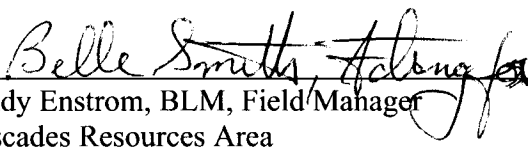
4. Implementation of this project does not establish a precedent for future similar actions with that may have significant effects or may represent a decision in principle about a future consideration [40 CFR 1508.27(b)(6)].
5. Cumulative Effects were evaluated in the context of past, present and reasonably foreseeable actions [40 CFR 1508.27(b) (7)]. No cumulative effects to the affected resources are expected (EA sections 3.1-3.4).
6. The proposed action has been determined to have no effect on threatened or endangered species or their habitat that has been determined to be critical under the ESA of 1973 [40 CFR 1508.27(b)(9)] (EA sections 4.2).
7. The proposed action does not violate any known Federal, State, or local law or requirement imposed for the protection of the environment [40 CFR 1508.27(b) (10)].

Prepared by: 
Amanda J. Baxter, Regulatory Project Manager
Eyak Technology, LLC

February 1, 2006
Date

Reviewed by: 
Carolyn Sands, BLM, NEPA

2/1/06
Date

Approved by: 
Cindy Enstrom, BLM, Field Manager
Cascades Resources Area

2/1/06
Date

TABLE OF CONTENTS

ABSTRACT	i
INTRODUCTION	ii
FINDING OF NO SIGNIFICANT IMPACT (FONSI)	iii
CHAPTER 1.0 – PROJECT SCOPE	1
1.1 Project Location	1
1.2 Purpose and Need	1
1.3 Conformance with Land use Plans, Policies, and Programs	1
1.4 Permits Required.....	2
1.5 Decision to be made.....	2
CHAPTER 2.0 – ALTERNATIVES	3
2.1 Alternative Development	3
2.2 Proposed Action (with Lattice Tower).....	3
2.3 Action Alternative (with Monopole Tree Tower).....	5
2.4 No Action.....	5
CHAPTER 3.0 – AFFECTED ENVIRONMENT and ENVIRONMENTAL EFFECTS	6
3.1 Visual Resources and Special Areas outside ACECs (Mt. Hood Corridor)	6
3.2 Soils	9
3.3 Vegetation	9
3.4 Public Safety	10
CHAPTER 4.0 – PUBLIC INVOLVEMENT and CONSULTATION.....	10
4.1 Public Involvement (Public Scoping and Notification)	10
4.2 ESA Section 7 Consultation.....	11
4.3 Consultation with Staff Specialists	11
CHAPTER 5.0 – LIST OF PREPARERS	12
CHAPTER 6.0 – ENVIRONMENTAL ELEMENTS REVIEW.....	12
Table 1: Environmental Review for the Critical Elements of the Environment	12
Table 2: Environmental Review for the Other Elements of the Environment.....	15
CHAPTER 7.0 – PUBLIC SCOPING COMMENTS.....	16
Table 3: Public Scoping Comments and Responses	16
Table 4: Post Public Forum Comments and Responses.....	17
CHAPTER 8.0 – SOURCES CITED and GLOSSARY	18
8.1 Sources Cited	18
8.2 Glossary	18
FIGURES	
Figure 1 – Site Location Map	1a
Figure 2 – Site Vicinity Map	1b
Figure 3 – Lease Area Layout	3a
Figure 4 – Lattice Tower Elevation	4a
Figure 5 – Microwave Path.....	4b
Figure 6 – Monopole Tree Tower Elevation	5a
Figure 7 – Project Location Site Photograph.....	9a
APPENDICES	
Appendix A – Photosimulations	

CHAPTER 1.0 – PROJECT SCOPE

1.1 Project Location

The Proposed Action is for the BLM to issue a Communication Use Lease that would authorize Clackamas County to construct a telecommunications facility in Township 2 South, Range 6 East, Section 14, Willamette Meridian, (Latitude 45.397444 and Longitude -122.040000) approximately 1.5 miles north of U.S. Highway 26 and the Brightwood area. A *Site Location Map* and *Site Vicinity Map* are included in this assessment as *Figures 1* and *2*, respectively.

1.2 Purpose and Need

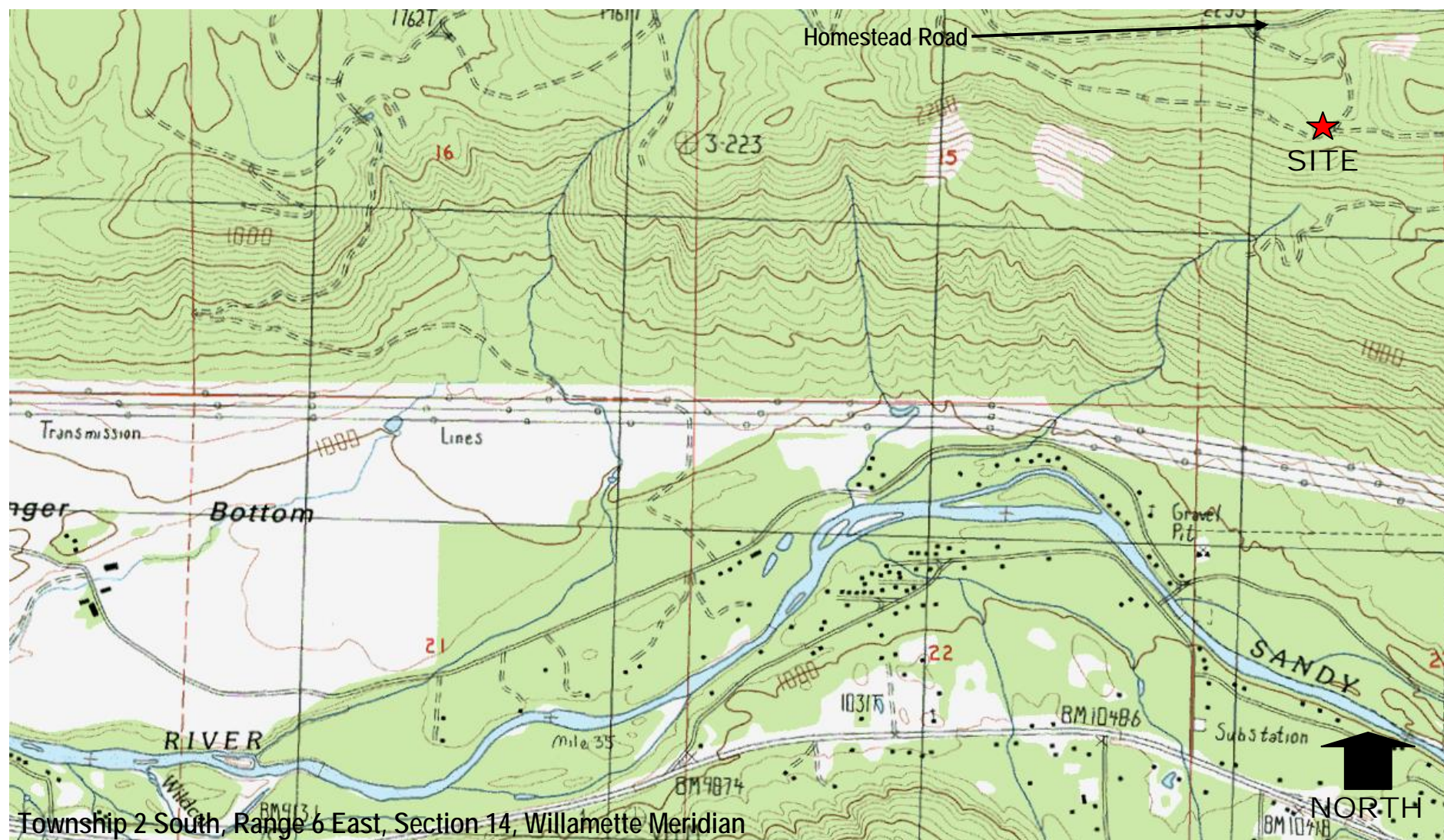
In order to provide coordinated assistance to the growing number of citizens in the County, emergency service providers must be able to communicate with one another effectively and efficiently by using reliable radio technology. The proposed project is needed since currently, emergency service providers responding to emergency situations along the U.S. Highway 26 corridor and outlying areas either have no radio communication capabilities or are required to use two forms of radio technology in these areas, neither of which are reliable.

Furthermore, Clackamas County and bordering counties are implementing an 800 MHz radio system. Construction of the proposed project would make the 800 MHz radio system available along the U.S. Highway 26 corridor and outlying areas, thus integrating emergency services communication within the County and other jurisdictions.

Two other existing telecommunications facilities were considered for collocation of Clackamas County's antennas and equipment. The Verizon/Nextel telecommunications facility located approximately 1,600 feet east of the project area was considered and rejected because there was no room to house new county equipment within their existing shelters and there was no additional space at the base of the tower to construct a new shelter. The Cingular (AT&T)/T-Mobile site located approximately 1,800 feet northeast of the project site was considered and rejected due to the interference with existing Cingular (AT&T) microwaves and the necessity to collocate equipment 130 feet northeast of their site to avoid interference. Developing this alternative site would also cause a greater amount of ground disturbance, tree removal, and road construction than the proposed site. In addition, this site is higher in elevation, so more of the proposed tower could potentially be seen.

1.3 Conformance with Land Use Plans, Policies, and Programs

The analysis in the Clackamas County Communications Use Lease Environmental Assessment is site-specific and supplements analyses found in the *Salem District Proposed Resource Management Plan/Final Environmental Impact Statement*, September 1994 (RMP/FEIS). The RMP/FEIS includes the analysis from the *Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl*, February 1994 (NWFP/FSEIS). The RMP/FEIS is amended by the *Final Supplemental Environmental Impact Statement for Survey and Manage, Protection Buffers, and Other Mitigation Measures in the Northwest Forest Plan*, November 2000 (SM/FSEIS); and the *Final Supplemental Environmental Impact Statement, Clarification of Language in the 1994 Record of Decision for the Northwest Forest Plan National Forests and Bureau of Land Management Districts Within the Range of the Northern Spotted Owl*, October 2003 (ACS/FSEIS).



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

SITE LOCATION MAP

PROPOSED CLACKAMAS COUNTY COMMUNICATIONS SITE

Clackamas County, Oregon

JPO Draw Down No:

038

Source:

USGS Topographic Map (Brightwood, OR)

Date:

JANUARY 2006

FIGURE:

Vicinity Map



SITE VICINITY MAP

Clackamas County Communication Site Lease
Clackamas County, Oregon

2

The proposed project is in conformance with the following documents: *Salem District Record of Decision and Resource Management Plan*, dated May 1995 (RMP); *Upper Sandy Watershed Analysis*, dated 1996; the *Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl* and *Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl*, dated April 1994 (NWFP); the *Record of Decision for Amendments to the Survey and Manage, Protection Buffer, and Other Mitigation Measures Standards and Guidelines*, dated January 2001 (SM/ROD); *Implementation of 2003 Survey and Manage Annual Species Review*, dated December 2003; and the *Record of Decision Amending Resource Management Plans for Seven Bureau of Land Management Districts and Land and Resource Management Plans for Nineteen National Forests within the Range of the Northern Spotted Owl, Decision to Clarify Provisions Relating to the Aquatic Conservation Strategy*, March 2004 (ACSRD).

This project is within the Mt. Hood Corridor and is designed to comply with Title IV of the Oregon Resource Conservation Act of 1996, P.L. 104-208 established the “Mt. Hood Corridor” (EA section 3.1). The Act directed that BLM-administered lands that can be seen from U.S. Highway 26 within the corridor be managed “*primarily for the protection or enhancement of scenic qualities. Management prescriptions for other resource values associated with these lands shall be planned and conducted for the purposes other than timber harvest, so as not to impair the scenic qualities of the area.*”

The above documents are incorporated by reference and are available for review in the Salem District office. Additional information is available in this project analysis file.

1.4 Permits Required

Clackamas County has applied for two commercial building permits with the Clackamas County Building Codes Division of the Department of Transportation and Development. Building permit number B0403205 is associated with the construction of the equipment shelter and building permit number B0403105 is associated with the construction of the telecommunications structure.

1.5 Decision to be Made

The Cascades Field Manager is the official responsible for deciding:

- ♦ Whether to implement this project as proposed, not at all, or to some other extent;
- ♦ whether site specific impacts would require supplementation of the analysis found in the RMP/FEIS through a new EIS; and
- ♦ which alternative best meets the purpose and need of the project and visual standards described in Title IV of the Oregon Resource Conservation Act of 1996, P.L. 104-208 that established the “Mt. Hood Corridor.”

CHAPTER 2.0 – ALTERNATIVES

2.1 Alternative Development

Pursuant to Section 102 (2) (E) of the National Environmental Policy Act of 1969, as amended (**NEPA**), Federal agencies shall “...study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” An action alternative was developed to address visual concerns identified by the public during the scoping period and to further mitigate potential visual resource impacts associated with a lattice tower in the Mt. Hood Corridor. Therefore, this EA will analyze the effects of the proposed action, the action alternative, and the no action alternative.

2.2 Proposed Action (with Lattice Tower)

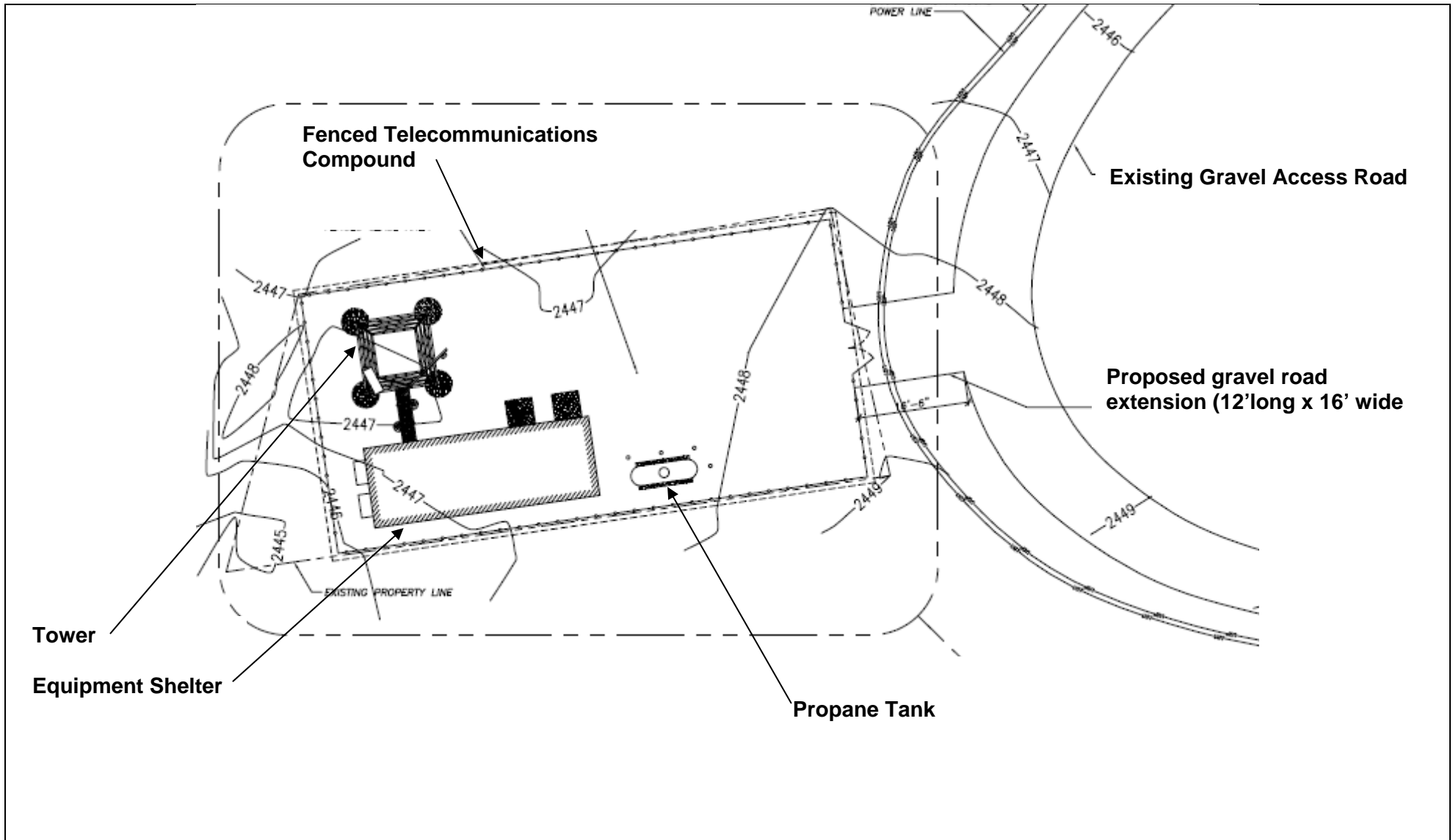
The “Proposed Action” would authorize Clackamas County to construct a telecommunications facility with a fenced, graveled covered compound that is approximately 40 feet by 80 feet in size and would consist primarily of a 70-foot-tall lattice-type telecommunications tower, a 12-foot by 34-foot equipment shelter, and a 4-foot by 8-foot concrete pad for a 500 gallon propane tank, which would be utilized to fuel an emergency backup electrical generator (*See Figure 3*). Compound security would be provided by an 8-foot-tall cyclone fence with 1 foot of barbed wire at the top of the fence.

Road Access: The proposed telecommunications facility would be accessed by constructing a 12-foot-wide by 16-foot-long graveled covered road, which would extend west to the fenced compound from an existing gravel road. Homestead Road (Road 2-6E-23.3) would remain gated and BLM would issue Clackamas County a key for administrative access only.

Site Disturbance and Rehabilitation: The proposed site improvements would consist of removing approximately 6 inches of soil within the entire compound to achieve a stable sub-base to accept fill and/or other material specified for construction of the tower and shelter foundations. Specifically, the tower foundation, which is located in the northwest corner of the fenced compound, is designed as a 20-foot by 20-foot concrete mat foundation and would require up to 4 feet of excavation. Following the completion of all construction activities, the remaining disturbed areas would be replanted with a native grass seed in order to prevent erosion or invasive weed infestation at the site. As determined during the archaeological pedestrian survey of the general project vicinity, the area around the proposed compound has already been disturbed by past use as a logging landing.

Construction Duration: Construction of the proposed project (i.e. physical site disturbance) is proposed to take a maximum of six months.

Proximity of Project Site Improvements to Water: No work would occur within streams or wetlands. Based on review of the USGS Topographic Map (Brightwood, OR) the topography is relatively flat with a gentle slope to the southwest. The nearest body of water to the project site is an unnamed stream located approximately 890 feet to the southwest, which deposits into the Sandy River located approximately 4,900 feet southwest of the project site. According to the construction specifications prepared for Clackamas County, the project vicinity would be protected from washouts and soil erosion with straw bales to protect soil deposition in area streams.



EyakTek
Eyak Technology, LLC

1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

LEASE AREA LAYOUT

Clackamas County Communications Site Lease
Clackamas County, Oregon

JPO Draw Down No: 038	Source: Motorola Site Plans (dated 08/03/05)	Date: DECEMBER 2005	Figure No: 3
--------------------------	---	------------------------	-----------------

Tower Design Features (*See Figure 4*): Below are the general design features of the proposed telecommunications tower.

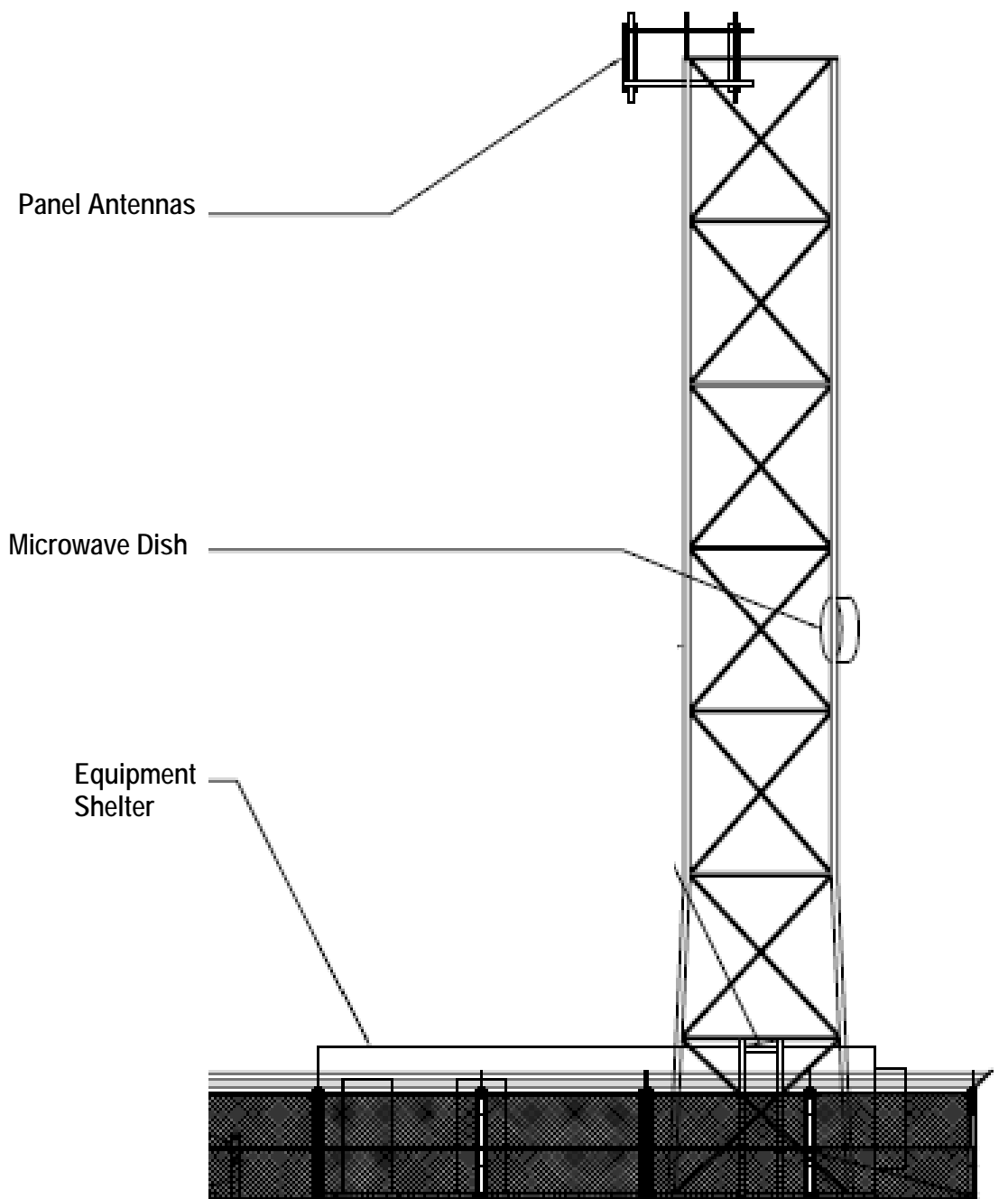
- ♦ **Height and Type:** The tower would be a four-legged lattice type design and 70-feet in height.
- ♦ **Lighting:** According the FAA Aeronautical Study 2005-ANM-1008-OE, the tower does not exceed obstruction standards and would not be a hazard to air navigation; therefore, marking and lighting are not necessary for aviation safety.
- ♦ **Color:** The tower and all tower components would be painted a dark green to help blend with the existing forest backdrop.
- ♦ **Transmission Components:** A microwave dish, which is 4-feet in diameter, would be mounted at 35-feet on the southwestern leg of the tower and two 8-foot-wide panel antenna arrays would be mounted at 70-feet on the southeastern leg of the tower, which would face the east and west.

Other Related Project Actions:

Tree Trimming for Communication Transmission Path: The project does not require the removal of trees; however some tree trimming would be necessary. A microwave dish would be mounted on the tower at a height of 35 feet and face southwest towards the Clackamas County Linhart Butte telecommunications facility which is proposed to be constructed approximately 7 miles southwest from the project area (*See Figure 5*). It is estimated that the trees located within the microwave transmission path to Linhart Butte would need to be trimmed to maintain a 25-foot height. The size of the transmission path through the trees outside of the compound would be relatively small (approximately 5 feet wide by 10 feet long) before open air space is reached.

Another two radio panel antennas would be mounted near the top of the tower with one facing west and the other facing east. Initially no tree trimming would be needed, however in the long term any trees within the radio transmission path would need to be trimmed and maintained slightly below the tower height. The size of the transmission path through the trees outside of the compound would be relatively small (approximately 20 feet wide on each side) before open air space is reached.

Electrical Grounding: As part of the site improvements, an electrical grounding system would be installed; however, installation of the electrical grounding system would take place within the confines of the fenced telecommunications compound and approximately 100 feet north and south along the existing disturbed ground adjacent to the gravel access road. The grounding system would be installed approximately 30 inches below the ground surface or 6 inches beneath the frost line. Based on the rock outcrops observed during the site visit, the site conditions may not allow installation at these depths; therefore, the grounding system would be installed at the depth of refusal on bedrock. The areas needed for electrical grounding have also already been disturbed by past logging activities or road development.



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

LATTICE TOWER ELEVATION

Clackamas County Communication Site Lease
Clackamas County, Oregon

JPO Draw Down No:

038

Source:

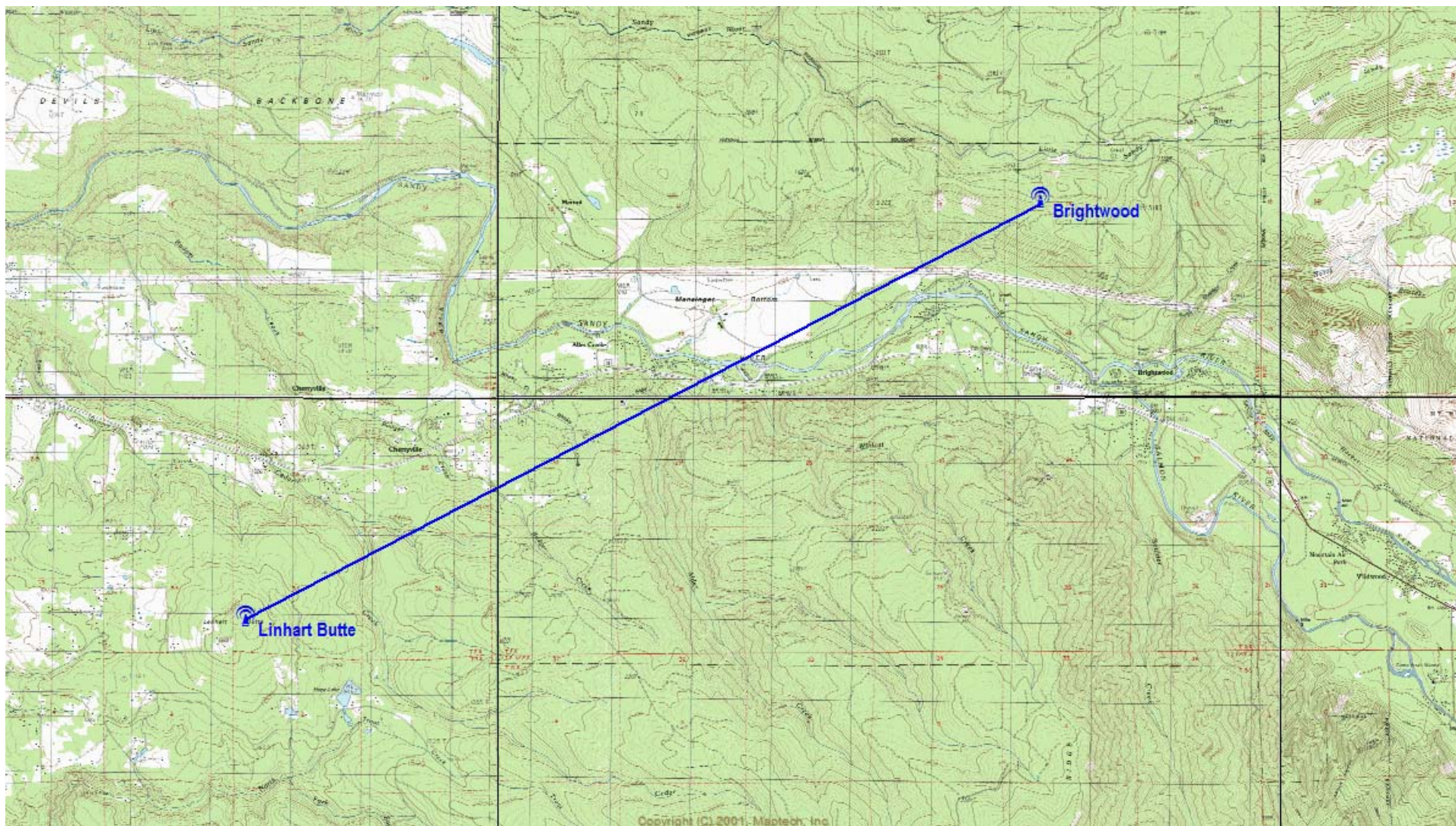
Motorola Site Plans (dated 08/03/05)

Date:

JANUARY 2006

Figure No:

4



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

MICROWAVE PATH

Clackamas County Communications Site Lease
Clackamas County, Oregon

JPO Draw Down No:
038

Source:

Terrain Navigator

Date:

JANUARY 2006

Figure No:

5

Construction Equipment: The following is a list of equipment and their uses, which are required to develop the site with the proposed telecommunications facility:

- ♦ Track hoe - general excavation
- ♦ Bob Cat - digging trenches and rock placement
- ♦ Large Caterpillar- pull trailer up to site with shelter
- ♦ Large Crane - set shelter and tower
- ♦ Cement truck - transport concrete to site
- ♦ Walk behind plate and/or jumping jack compactor - compact gravel
- ♦ Contractor pick-up and flatbed trucks - transport personnel, equipment and supplies.
- ♦ Dump truck - transport gravel to site
- ♦ All earth moving equipment and off-road machinery would be cleaned and free of soil, brush, weeds and any part thereof before entering BLM lands to help prevent the spread of invasive weed species.

Construction Staging Area: Throughout the duration of the site construction, Clackamas County would use approximately 50 X 100 feet adjacent to the Verizon/Nextel site for a construction staging area, located approximately 1,600 feet east of the proposed project. This 5,000-square-foot area is an existing disturbed area currently used as a parking area for maintenance purposes for the existing telecommunications facility.

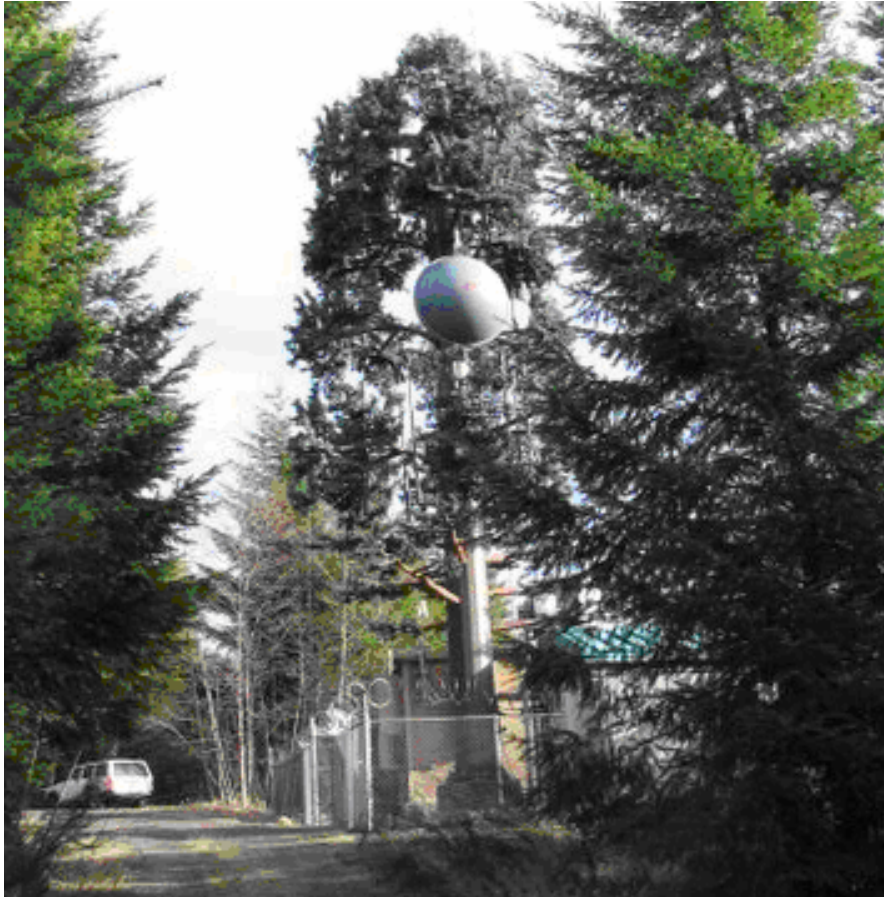
2.3 Action Alternative (with monopole tree tower)

The “Action Alternative” is similar to the Proposed Action with the following differences. Clackamas County would construct a 70-foot-tall “stealth” monopole-type telecommunications tower, which is designed to imitate a conifer tree (*see Figure 6*) to address visual concerns identified by the public during the scoping period and to further mitigate potential visual resource impacts. Scaled photosimulations that present the appearance of the action alternative from three specific locations (*see Appendix A*) can be described in detail in *Section 3.1: Visual Resources and Special Areas outside ACECs (Mt. Hood Corridor)*.

All other construction aspects associated with the fenced telecommunications tower, site access, construction specifications, design features, and the electrical grounding system would remain consistent with the details as presented in *Section 2.2-Proposed Action*.

2.4 No Action

BLM would not authorize the Communications Use Lease to Clackamas County; therefore, improvements associated with the proposed action would not occur. The purpose of the “No Action” alternative is to present a benchmark for comparing environmental effects to the Proposed Action (with lattice tower) and the Action Alternative (with monopole tree tower).



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

MONOPOLE TREE TOWER ELEVATION

Clackamas County Communication Site Lease
Clackamas County, Oregon

JPO Draw Down No:

038

Source:

Date:

JANUARY 2006

FIGURE:

6

CHAPTER 3.0 – AFFECTED ENVIRONMENT and ENVIRONMENTAL EFFECTS

The following section describes the affected environment and environmental effects associated with the proposed project. The affected elements of the environment (EA Chapter 6.0: Environmental Elements Review) are visual resources and special areas outside ACECs (Mt. Hood Corridor), soils, vegetation- forest environment, and public safety.

3.1 Visual Resources and Special Areas outside ACECs (Mt. Hood Corridor)

Affected Environment

The proposed telecommunications facility would be located on BLM-administered lands within the “Mt. Hood Corridor” which emphasizes the protection of scenic quality. The highest classification under the BLM’s Visual Resource Management (VRM) Program is Class I which calls for, “preserving the existing character of the landscape.” Some very limited management may occur in these areas. The level of change to the characteristic landscape should be very low and not attract attention. Changes should repeat the basic elements of form, line, color, texture and scale found in the predominant natural features of the characteristic landscape.

The key observation area of concern for visual resources is identified for the “Mt. Hood Corridor” as being the viewshed from U.S. Highway 26. A field review of the area indicated that the segment of the highway from which the project area would be observable extends approximately three miles from Hummingbird Road to the west intersection of Brightwood Road. The foreground of this part of the highway is characterized by natural features such as rivers and roadside trees and several man-made features such as roads, signs, residences and utility poles and lines. Background from the highway is characterized with forested hills along both sides and views of Mt. Hood when traveling east. The project area would be in the observer’s periphery rather than direct view when traveling both directions of the highway. Roadside trees along the highway also help screen the project area from full view. As a result, only glimpses of the project area are likely to be observable for very short periods of time (seconds) when traveling both directions of the three mile segment of U.S. Highway 26.

Existing communication facilities on BLM-administered lands near the project area are well screened by trees and are difficult to see when driving along Highway 26, unless the observer is specifically looking for the communication facilities and knows where and what to look for.

Other roads where glimpses of the project area may be observable include Marmot Road, Barlow Trail Road, Sleepy Hollow Road, Brightwood Loop Road, and several bridges in the area of these roads that cross the Sandy River. Again the project area is often in the observer’s periphery view and road side vegetation helps provide screening. The project area may also be observable from residences in the area near the roads described above.

Environmental Effects

Proposed Action (with Lattice Tower)

The Proposed Action would comply with the Oregon Resource Conservation Act of 1996 and Visual Resource Management Class I Objectives for preserving the existing character of the landscape. The only component of the proposed telecommunications facility that is likely to be seen is the top (approximately 20 feet) of the 70-foot lattice tower. The rest of the site is screened by the trees that surround the project area. In an effort to help evaluate the visual effects of the lattice tower, three specific locations were identified as key observation points for which scaled photo simulations were created (*see Appendix A*), showing the proposed tower on the project area. The first two were from locations along or near U.S. Highway 26 from where it appeared that the proposed tower might be most clearly observable for the purposes of preparing the photo simulations (*see Appendix A-1 and A-2*). The other location was from along Marmot Road where the lattice tower might also be observable along a stretch of the road where little screening is provided by roadside vegetation (*see Appendix A-3*).

The locations of all three key observation points and the segment of U.S. Highway 26 from Hummingbird Road to the first intersection with Brightwood Road from which glimpses of the project area may be observable is presented in *Appendix A-4*.

Appendix A-1 - Visual Simulation 1-Hwy 26

Appendix A-1 - Visual Simulation 1 – Hwy 26: Illustrates that without the magnification provided by the “super telephoto zoom detail,” the general area around the proposed project can be seen from U.S. Highway 26, but given the distance from the highway very little, if any, of the lattice tower is observable to the extent that it is likely to draw the attention of those traveling along the highway or from most residences in the area. Within 10-20 years, the tower would become almost invisible as the trees around the site help screen the tower from view. The short term and long term tree trimming needed to keep the transmission paths clear is not expected to be visible from the highway given that the microwave dish and panels are facing east/west away from the highway.

Appendix A-2 - Visual Simulation 2-Substation

Appendix A-2 - Visual Simulation 2– Substation: Again, this simulation helps illustrate that without the magnification provided by the “super telephoto zoom detail,” the general area around the proposed project can be seen, but given the distance from the U.S. Highway 26, very little, if any of the lattice tower is observable to the extent that it is likely to draw the attention of those traveling along this route or other routes heading towards the tower from the highway or from most residences in the area. Within 10-20 years, the tower would become almost invisible as the trees around the site help screen the tower from view. The short term and long term tree trimming needed to keep the transmission paths clear is not expected to be visible from routes traveling from the highway towards the tower given the direction that the panels are facing.

Appendix A-3 - Visual Simulation 3-Meadow

Appendix A-3 - Visual Simulation 3- Substation: This simulation helps illustrate that without the magnification provided by the “super telephoto zoom detail,” the general area around the proposed project can be seen, but the lattice tower is likely to blend in with the back drop of trees behind it to the extent that it does not draw the attention of those traveling along Marmot Road towards the tower or from most residences in the general area. Observable changes from tree trimming within the microwave and radio transmission paths are again expected to be minimal and should blend into the backdrop of the trees behind the tower.

Cumulative Effects: No cumulative impacts are expected given that the portion of the lattice tower that might be seen is not likely to draw the attention of observers from U.S. Highway 26, the primary key observation area.

Action Alternative (with Monopole Tree Tower)

The Action Alternative would comply with the Oregon Resource Conservation Act of 1996 and Visual Resource Management Class I Objectives for preserving the existing character of the landscape. Visual effects associated with the Action Alternative would be similar to those described for the Proposed Action with the following differences as described. The entire monopole tree tower structure may be larger in size and more observable. However, the form, line, color and texture of the tower would mimic the appearance of a conifer tree. This would help the tower appear less like a man-made structure and would better blend in with the surrounding forested character of the landscape (*See Figure 6*). Within 10-20 years, the effects of the monopole tree tower would be similar to those described for the lattice tower. Visual Simulations for the action alternative may be found in *Appendix A-5 through A-7*.

Cumulative Effects: No cumulative impacts are expected given that the portion of the monopole tree tower that might be seen is not likely to draw the attention of observers from U.S. Highway 26 or other roads and residences in the general area. The effectiveness of monopole tree towers is also demonstrated by the installation of a similar 45-foot monopole tree tower in the year 2000 at the Verizon/Nextel telecommunications facility approximately 1,600 feet east of the project area. This existing monopole tree tower is very difficult to identify from the highway or other roads in the area as anything but a slightly larger tree than normal.

No Action

Neither action alternative would be implemented. Therefore no changes to the landscape character on BLM-administered lands in the Mt. Hood Corridor would be expected to occur.

3.2 Soils

Affected Environment

According to the Clackamas County Soil Survey (November 1985), the proposed lease area is underlain by Zygoré gravelly loam (94D). Zygoré gravelly loam is described as deep, well drained soils found on mountainous uplands and formed in established colluvium derived mainly from underlying basalt and andesite mixed with volcanic ash. Hazards of water erosion in these soils are moderate due to medium runoff and its moderate permeability. The topography of the project site is relatively flat and has been previously disturbed during former logging activities, which reportedly occurred in the mid to late 1940's.

Environmental Effects

Proposed Action (with Lattice Tower) and Action Alternative (with Monopole Tree Tower)

Minimal impacts to soils are expected given that the project site is relatively flat and has been previously disturbed. Excavation for site preparation would displace topsoil. Construction of the cement pad would slightly reduce the permeable surfaces. Furthermore, the soils disturbed during construction activities would be regarded on-site and compacted to provide a structural sound sub-base for construction of the telecommunications facility. The use of straw bales and replanting of the project with native grass seed where needed would also help protect against excessive soil erosion.

Cumulative Effects: Give the small size and scale of the project (*see Section 2.2-Proposed Action-Site Disturbance and Rehabilitation*) and the minimal effects to soils, no cumulative effects were identified.

No Action

Since no ground disturbance would occur, no direct or indirect effects would impede the current soil processes.

3.3 Vegetation

Due to past use as a logging landing, the proposed project area has almost no remaining trees and almost no native shrubs and grasses (*see Figure 7*). Trees in the proposed transmission paths consist primarily of young conifer trees approximately 45 feet tall.

Environmental Effects

Proposed Action (with Lattice Tower) and Action Alternative (with Monopole Tree Tower)

Effects to vegetation would be minimal given the small size of the site and the fact that very little native vegetation would be disturbed and no trees would be removed. As stated in Section 2.2-Proposed Action-Tree Trimming for Communication Transmission Path, some tree trimming would be necessary, but is expected to result little or no tree mortality.

Cumulative Effects: Give the small size and scale of the project and the minimal effects to vegetation, no cumulative effects were identified.

No Action

Since no disturbance to vegetation would occur, no direct or indirect effects would impede the current growth processes.



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

PROJECT LOCATION SITE PHOTOGRAPH

Clackamas County Communication Site Lease
Clackamas County, Oregon

JPO Draw Down No:

038

Source:

EYAKTEK

Date:

JANUARY 2006

FIGURE:

7

3.4 Public Safety

Affected Environment

As stated in *Section 1.2-Purpose and Need*, the proposed project is needed since currently, emergency service providers responding to emergency situations along the U.S. Highway 26 corridor and outlying areas either have no radio communication capabilities or are required to use two forms of radio technology in these areas, neither of which are reliable.

Environmental Effects

Proposed Action (with lattice tower) and Action Alternative (with monopole tree tower)

Clackamas County and bordering counties are implementing an 800 MHz radio system. Construction of the proposed project would make the 800 MHz radio system available. The proposed telecommunications facility has a beneficial effect on Public Safety by expanding emergency communication services along the U.S. Highway 26 corridor and outlying areas, thus integrating emergency communication within the County and other jurisdictions. In addition, the 800 MHz radio system has additional safety features for responders such as an emergency button that can be activated to send a non-verbal signal to dispatchers when a deputy or firefighter is in danger.

Cumulative Effects: Implementation of the proposed project would provide a long term emergency communications benefit to the county as they plan to upgrade communications services further east.

No Action

Should the proposed project not be implemented, the technical integrity of emergency communications would be jeopardized in the target service area (U.S. Highway 26 corridor) as well as points further east.

CHAPTER 4.0 – PUBLIC INVOLVEMENT, CONSULTATION, and MONITORING

4.1 Public Involvement (Project Scoping and Notification)

On October 15, 2005 approximately 10,289 notifications of the proposed project scope were sent out via U.S. Mail to potentially affected and/or interested individuals, groups, and agencies and also included residents and businesses in Sandy, Brightwood, Welches/Wemme and Rhododendron/ZigZag. The notification consisted of postcard mailer containing information about the project location and design, as well as a web address to allow the public to view photosimulations of what the lattice-type telecommunications towers may look like from three key observation points. In addition to the website, the project scope and photosimulations were available for review at the Sandy District Fire Department.

A total of 24 responses were received and a summary of these comments may be found in Table 3 (EA Chapter 7). A public forum was held by Clackamas County at the Mt. Hood RV Village on December 16, 2005 from 5:00 pm to 8:00 pm to address any public questions or concerns about the proposed project. A summary of additional comments received after the public forum may be found in Table 4 (EA Chapter 7).

The EA and FONSI will be made available for public review from February 8, 2006 through March 9, 2006. This document will be available at the BLM's Salem District Office and posted on the Internet at <http://www.eyaktek.com/casestudies/ClackamasCoCommLease-EADocument.pdf>. The notice for public comment will be published in a legal notice in The Sandy Post and posted on the website shown above. Comments received by the Salem District Office, 1717 Fabry Road SE, Oregon 97306, on or before March 9, 2006 will be considered in making the final decisions for this project.

4.2 ESA Section 7 Consultation

A determination has been made that this project would be considered a "No Effect" action that does not require consultation with the U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration for any species. No suitable habitat for any threatened or endangered plant, animal or fish species would be modified by either of the action alternatives. Any potential noise disturbance from construction activities on suitable habitat for the Northern spotted owl within ¼-mile of the proposed project area would not be above the already high ambient noise levels of the project vicinity associated with use of U.S. Highway 26, other nearby roads and other human uses. Therefore no seasonal restrictions would be necessary.

4.3 Consultation with Staff Specialists

The following individuals were consulted with as part of this EA:

- ♦ **Botany TES and Special Attention Plant Species**
Terry Fennell, BLM, Botanist
- ♦ **Cultural Resources**
Fran Philipek, BLM, Archaeologist
Kirk Ranzetta, Oregon Department of Historic Preservation
- ♦ **Wildlife and T&E Animal Species**
James England, BLM, Wildlife Biologist
- ♦ **Fisheries/T&E Fish Species**
Dave Roberts, BLM, Fish Biologist
- ♦ **Hydrology/Water Quality**
Patrick Hawe, BLM, Hydrologist
- ♦ **Recreation/Visual Resources**
Laura Dowlan, BLM, Outdoor Recreation Planner
- ♦ **BLM Site Lease Policy**
Janet Myers, BLM, Reality Specialist
- ♦ **Clackamas County Communications Department**
Dana Robinson, Homeland Security
Gerry Wiese, Technical Services Coordinator
Dan O'Dell, Project Manager
James White, Radio
- ♦ **Federal Communications Commission**
Mr. Donald Johnson, Wireless Telecommunications Bureau, Counsel

CHAPTER 5.0 – LIST OF PREPARERS

The following individuals prepared technical reports that were implemented as part of this EA:

- ♦ **Cultural Resources**

Kerri Barile, Ph.D., Dovetail Cultural Resources Group, LLC

Michael Carmody, Dovetail Cultural Resources Group, LLC

- ♦ **Recreation/Visual Resources**

Don Carmickle, Previsualists (prepared visual simulations)

CHAPTER 6.0 – Environmental Elements Review

The elements of the environment, required by law, regulation, Executive Order and policy were reviewed to determine if they would be affected by the proposed project. *Table 1* (Critical Elements of the Environment from BLM H-1790-1, Appendix 5) and *Table 2* (Other Elements of the Environment) summarize the results of that review. Affected elements are **bold**. Unless otherwise noted, the effects apply to the action alternatives.

Table 1: Environmental Review for the Critical Elements of the Environment (BLM H-1790-1, Appendix 5)			
Elements Of The Environment	Status: (i.e., Not Present , Not Affected, or Affected)	Does this project contribute to cumulative effects? Yes/No	Remarks
Adverse Impacts on the National Energy Policy	Not Affected	No	There are no known energy resources located in the project area. The proposed action would have no effect on energy development, production, supply and/or distribution.
Air Quality	Affected	No	The effects of occasionally operating the back-up propane fueled generator would be minimal and according to the Oregon Department of Environmental Quality (DEQ), would not require an Air Quality permit.
Areas of Critical Environmental Concern	Not Present	No	

Table 1: Environmental Review for the Critical Elements of the Environment (BLM H-1790-1, Appendix 5)

Elements Of The Environment	Status: (i.e., Not Present , Not Affected, or Affected)	Does this project contribute to cumulative effects? Yes/No	Remarks
Cultural Resources	Not Present	No	A Cultural Resources Survey prepared by Dovetail Cultural Resources Group, LLC did not identify archeological sites or historic buildings recommended eligible for listing in the NRHP within the projects Area of Potential Effect (APE), which was defined and agreed by BLM and the Oregon State Historic Preservation Office (SHPO) as the entire subsurface impact area for archeology and a one-half mile radius for architecture. If cultural resources are found during construction activities, all disturbances would cease and, the project may be redesigned to protect the cultural resource values present, or evaluation and mitigation procedures would be implemented based on recommendations from the BLM District Archaeologist.
Environmental Justice (Executive Order 12898)	Not Affected	No	The proposed action is not anticipated to have disproportionately high and adverse human health or environmental effects on minority populations and low-income populations.
Prime or Unique Farm Lands	Not Present	No	
Flood Plains	Not Present	No	
Hazardous or Solid Wastes	Not Present	No	
Invasive, Nonnative Species (Executive Order 13112)	Not Affected	No	The invasive/nonnative species that are found in the area of the proposed action are common roadside species. Due to limited scope of the proposed action, no measurable affect (increase or decrease) to these species populations is anticipated. See Project design features (EA section 2.2)
Native American Religious Concerns	Not Affected	No	Three individual tribes were notified in writing regarding the proposed project activities. No tribes have provided comments on the proposed project.
Threatened or Endangered (T/E) Fish Species or Habitat	Not Affected	No	The proposed action would have no effect on T/E fish species or habitat. The “no effect” determination is based on project design features that include all project activities occurring on relatively flat topography preventing excessive runoff.
Threatened or Endangered (T/E) Plant Species or Habitat	Not Present	No	

Table 1: Environmental Review for the Critical Elements of the Environment (BLM H-1790-1, Appendix 5)

Elements Of The Environment	Status: (i.e., Not Present , Not Affected, or Affected)	Does this project contribute to cumulative effects? Yes/No	Remarks
Threatened or Endangered (T/E) Wildlife Species or Habitat	Not Affected	No	The proposed action would have no effect on endangered or threatened terrestrial species or its habitat that has been determined to be critical under the Endangered Species Act (ESA) of 1973 [40 CFR 1508.27(b)(9)]. The “no effect” determination is based on the location and nature of the project and that the scale of the project is small and would not result in habitat modification. (See Chapter 4, Section 4.2, page 11). Bald Eagles are unlikely to nest in the tower or trees adjacent to the communication facility due to the distance of the project site to the Sandy River, and the smaller size of the adjacent trees.
Water Quality (Surface and Ground)	Not Affected	No	Given the distance from any streams, and that average digging activities are likely to be less than one foot, no soil or other inputs are expected to Water Quality.
Wetlands/Riparian Zones	Not Present	No	
Wild and Scenic Rivers	Not Present	No	
Wilderness	Not Present	No	

Table 2: Environmental Review for the Other Elements of the Environment (Required by law, regulation, policy or management direction)

Elements Of The Environment	Status: (i.e., Not Present , Not Affected, or Affected)	Does this project contribute to cumulative effects? Yes/No	Remarks Not affected– why
Aquatic Conservation Strategy Objectives	Not Affected	No	Given the distance from any streams and the relatively small size of the disturbed area, the project is unlikely to impede and/or prevent attainment of Aquatic Conservation Strategy Objectives.
Coastal zone	Not Present	No	
Downstream Beneficial Uses	Not Affected	No	See water quality, in Table 1.
Fire Hazard/Risk	Not Affected	No	
Fish Species with Bureau Status and Essential Fish Habitat	Not present	No	Given the distance from any streams, the project is not expected to have any affect on Essential Fish Habitat as designated under the Magnuson Stevens Act.
Land Uses (right-of-ways, permits, etc)	Not Affected	No	No existing uses associated with rights-of-ways in the project vicinity would be affected.
Late successional and old growth species habitat	Not present	No	
Mineral Resources	Not Present	No	
Public Safety	Affected	No	Effects described in Chapter 3, Section 3.4, Page 10
Recreation	Not Affected	No	Recreational use around the proposed project area is very low to none and no changes to recreation use or access are expected.
Rural Interface Areas	Not Present	No	
Soils (productivity, erodibility, mass wasting, etc.)	Affected	No	Effects described in Chapter 3, Section 3.2, Page 9
Special Areas outside ACECs (Within or Adjacent) (RMP pp. 33-35)	Affected	No	Effects to Congressionally designated Mt. Hood Corridor are described in Chapter 3, Section 3.1, Pages 6–8
Other (Non- T/E) Special Status Species (including Survey and Manage)	Not Present	No	No habitat for these species is present within the project area.
Vegetation – Forest Environment	Affected	No	Effects described in Chapter 3, Section 3.3, Page 9
Visual Resources	Affected	No	Effects described in Chapter 3, Section 3.1, Pages 6–8
Water Resources – Other (303d listed streams, DEQ 319 assessment, water quantity, Key watershed)	Not Present	No	
Water Use - Municipal and Domestic	Not Present	No	

CHAPTER 7.0 – Public Scoping Comments

Table 3 below depicts a summary of the public comments received regarding the project scoping mailer discussed in *EA Section 4.1 – Public Involvement*. In addition, responses to substantive comments that are not addressed in the content of this EA are presented below.

Table 3: Public Scoping Comments		
LOG#	DATE	COMMENTS
01	10/13/05	Keep on update list; 1. Who is doing the work on the EA? 2. Have there been BLM changes in the Public Scoping where requested comments are kept confidential? <i>Response: Only names and addresses may be confidential if the commenter requested that their name be withheld at the time of their comment. The comment itself is part of the public record.</i> 3. Would like a copy of the DRAFT EA. Is this document open for comments too? <i>Response: The EA/FONSI will be made available for review. A 30-day comment period applies.</i>
02	10/14/05	Early morning Oregonian carrier for Brightwood/Lolo Pass unable to make calls in certain areas of the Barlow trail; crucial during winter and agrees there is a need for the tower. <i>Response: The tower is not proposed to be constructed for cellular use; however, Clackamas County will make the tower available for cellular collocation, if required.</i>
03	10/14/05	Thought the tower would be next door but realizes the location is different and will not be a problem; Amanda Baxter was very helpful
04	10/15/05	Agrees there is a need for a tower and strongly approves of the proposal; additional facility will greatly improve Clackamas County's emergency services now and in the future
05	10/15/05	Photos and map are labeled "Existing 1" and "Simulation 1", is it Easternmost Junction of Sleepy Hollow and Highway 26? There were no posted photos of Westernmost junction of East Sleep Hollow and Hwy 26. Doesn't want tower to block "excellent view across the river and into the forest" and needs to verify location; Would like photos forwarded to her. <i>Response: Location verified and photos were forwarded to citizen on 10/15/05.</i>
06	10/17/05	Was able to determine location of tower and still concerned if the tower is visible from their property. Will pick up hard copy of the study from the Fire Department in Sandy
07	10/17/05	Long time resident and retired Oregon State Police sergeant; communication is very poor and more towers are needed for emergency, cell phones, and amateur radio; the tower will be an asset for emergency personnel; A part of Hwy 26 Safety committee for 25+ years, very involved in community and has explained the impact this will have. His son installs cell phone towers in the area; wants progress and survey updates; feel free to contact
08	10/17/05	Will the proposed tower be lighted at night? <i>Response: As stated in Section 2.2-Proposed Action-Tower Design Features, the tower is not required to be lighted.</i> Are there photo simulations? <i>Response: As the tower will not be lighted, photosimulations depicting lighting were not prepared.</i>
09	10/17/05	For the record, "opposed to another cell tower going up in this scenic area"; there are many other towers already in existence that should be able to be shared
10	10/17/05	Could not determine location of site plan and would like a map showing roads with road names, and residences with respect to tower location; There should be testing if project site is in view of the Sandy River bridge; disagrees that balloon sittings are unreliable; please respond allowing enough time for additional comments to be made prior to the ending of the comment period
11	10/17/05	Unable to access the link, went to www.eyaktek.com/Projects/Brighwood ; thinks : "stinks to mar this beautiful valley with an ugly tower"; already have best emergency response times in state; stick the tower in your backyard
12	10/18/05	Sees no problem with the plans as outlined
13	10/18/05	Degrading to the mountain; not protecting or enhancing the beautiful Mt. Hood Corridor; how did emergency personnel make it in the past? BLM should quit ruining the environment by tearing out trees

Table 3: Public Scoping Comments		
LOG#	DATE	COMMENTS
		for more projects and roads
14	10/19/05	Can this tower also host cell phones so those living in the non cell phone areas can access emergency services? <i>Response: The tower is not proposed to be constructed for cellular use; however, Clackamas County will make the tower available for cellular collocation, if required.</i>
15	10/19/05	Opposed to the new tower; there isn't enough justification why it is needed; emergency personnel seem to operate just fine with what they have now; the risks of living in such a remote area is understood by those who live there; feel free to contact, it wasn't long ago that the neighborhood put up a defense against a cell phone tower <i>Response: Implementation justification is presented in Section 1.2-Purpose and Need.</i>
16	10/24/05	Concerned by loose wording: "BLM is considering issuing a Communications Lease" – are they or aren't they; "to erect an approximate 70-foot lattice-type telecommunication tower" – more clarification is needed on height as well as if red lights will be on the tower; otherwise agrees with necessity of tower.
17	10/24/05	Please keep on mailing list
18	10/27/05	Not opposed to the proposed construction but please be respectful of the land during construction
19	10/28/05	LVM – highly opposed
20	10/29/05	Not opposed but would prefer a more accessible site along the Marmot Road for the project; concerned about visual and environmental impact from development and maintenance; ORV access has been a problem in the past and slowly improving, would recommend Clackamas County manage land to prevent ORV access to Homestead Road area;
21	10/29/05	Problems accessing the site – entered wrong address
22	10/30/05	Supports improvement of emergency communications; website had markers for pictures not available: #4, 5, & 6 when counting from left; would like projection of visibility or invisibility of tower as trees grow; will the tower still work when it is significantly shorter than the Doug Firs or will there need to be a re-build as the trees grow?;
23	11/4/05	Opposed to any more towers, fencing destroys wild life, sounds of currents, and scenic view of the Mt. Hood Corridor would also be destroyed; will appeal to the State Land Use; keep informed of updates
24	11/13/05	Meeting on Nov 3 rd with Mount Hood CPO, additional comments and concerns regarding the communications site: 1- What kind of lighting required at the base of the facility and on the tower. Would prefer minimal lighting and directed towards the ground to avoid light pollution; <i>Response: A small porch light will be mounted on the exterior of the equipment shelter and will be pointed towards the ground to minimize ambient light.</i> 2-no acknowledgement of comments already sent; 3-inadequate information available on the postcard, confusion on timeline for comments since there was no postmark on the card; welcomes presentations for "this type of proposal" or set up a local public forum.

Table 4: Post Public Forum Comments and Responses		
LOG#	DATE	COMMENTS
25	12/16/05	Please eliminate illegal access through Clackamas County Bartlow Trail Park, which connects to Homestead Road. Off road and pick-up trucks have access. Vandalism and timber theft are increasing. <i>Response: Illegal access through Bartlow Trail Park is not analyzed in this EA/FONSI as it is outside the project scope.</i>
26	12/16/05	Illegal access through County managed land. <i>Response: Illegal access through Bartlow Trail Park is not analyzed in this EA/FONSI as it is outside the project scope.</i>
27	12/22/05	The Portland Water Bureau supports Clackamas's Co. project. However, recommends that the EA include language regarding the need to control trespassing on Clackamas Co land known as "Bartlow Trail County Park". <i>Response: Illegal access through Bartlow Trail Park is not analyzed in this EA/FONSI as it is outside the project scope.</i>

CHAPTER 8: Sources Cited and Glossary

8.1 Sources Cited

Pub. L. No. 104-208; 110 Stat. 3009-536. *Title IV: Mount Hood Corridor*. Sec. 401. Land Exchange.

8.2 Glossary

National Environmental Policy Act (NEPA) - The basic national charter for the protection of the environment. It establishes policy, sets goals (section 101), and provides means (Section 102) for carrying out the policy.

Project Scoping - An ongoing process to determine the breadth and depth of an environmental analysis.

Environmental Assessment (EA) – A concise document showing a systematic process of developing reasonable alternatives; and predicting the probable environmental consequences of a proposed action and the alternatives.

Finding of No Significant Impact (FONSI) – Documentation that states the proposed action would have no significant impact on human health or the environment.

Federal Communications Commission (FCC) – FCC is an independent United States government agency, directly responsible to Congress. The FCC was established by the Communications Act of 1934 and is charged with regulating interstate and international communications by radio, television, wire, satellite and cable. The FCC's jurisdiction covers the 50 states, the District of Columbia, and U.S. possessions.

Federal Aviation Administration (FAA) - FCC requires antenna structure owners to first obtain a valid determination of "no hazard" from the FAA before registering with FCC. Owners of any structure that may pose a hazard to airspace have an independent obligation to notify the FAA. In the case of antenna structures, the FCC uses the FAA's recommendation in assigning painting and lighting (if necessary) in Antenna Structure Registration.

Photosimulations – Photos that are digitally altered to realistically illustrate something that does not currently exist.

Endangered Species Act (ESA) - An Act of Congress in 1973 that defines the criteria for species that are in danger of extinction throughout all or a significant portion of its range.

Aquatic Conservation Strategy (ACS) - The Aquatic Conservation Strategy was developed to restore and maintain the ecological health of watersheds and aquatic ecosystems contained within them on public lands. The strategy would protect salmon and steelhead habitat on federal lands managed by the Forest Service and the Bureau of Land Management within the range of the Northern Spotted Owl. The Aquatic Conservation Strategy is designed to meet nine objectives. Compliance with the Aquatic Conservation Strategy objectives means that an agency must manage the riparian-dependent resources to maintain the existing condition or implement actions to restore biological and physical processes within their ranges of natural variability.

Best Management Practices (BMP) - Those practices utilized by the Bureau of Land Management (located in appendix C of the *RMP*) that are intended to maintain or improve water quality and soil productivity.

Interdisciplinary Team (IDT) - A group of resource specialists who conduct the environmental assessments.

Riparian Reserves (RR) - A Federal (BLM or USFS) land-use allocation which overlays all other land allocations. They are lands along streams and unstable and potentially unstable areas where special standards and guidelines direct land use.

Riparian Zones - Those parts of the riparian reserves where actual riparian conditions exist.

Salem District Record of Decision and Resource Management Plan (May 1995) (RMP) - The Management Plan that addresses resource management on all Bureau of Land Management administered land within the Salem District.

APPENDIX A

August 24, 2005

**Photosimulation of view looking northeast from Hwy 26
at the westernmost junction of E Sleepy Hollow.**



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

**VISUAL SIMULATION 1-HWY 26
PROPOSED ACTION
PROPOSED CLACKAMAS COUNTY COMMUNICATIONS SITE
Clackamas County, Oregon**

JPO Draw Down No:

038

Source:

PreVisualists, Inc.

Date:

JANUARY 2006

APPENDIX:

A-1

August 24, 2005

**Photosimulation of view looking northeast from Hwy 26
at the easternmost junction of E Sleepy Hollow.**



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

**VISUAL SIMULATION 2-SUBSTATION
PROPOSED ACTION
PROPOSED CLACKAMAS COUNTY COMMUNICATIONS SITE
Clackamas County, Oregon**

JPO Draw Down No:

038

Source:

PreVisualists, Inc.

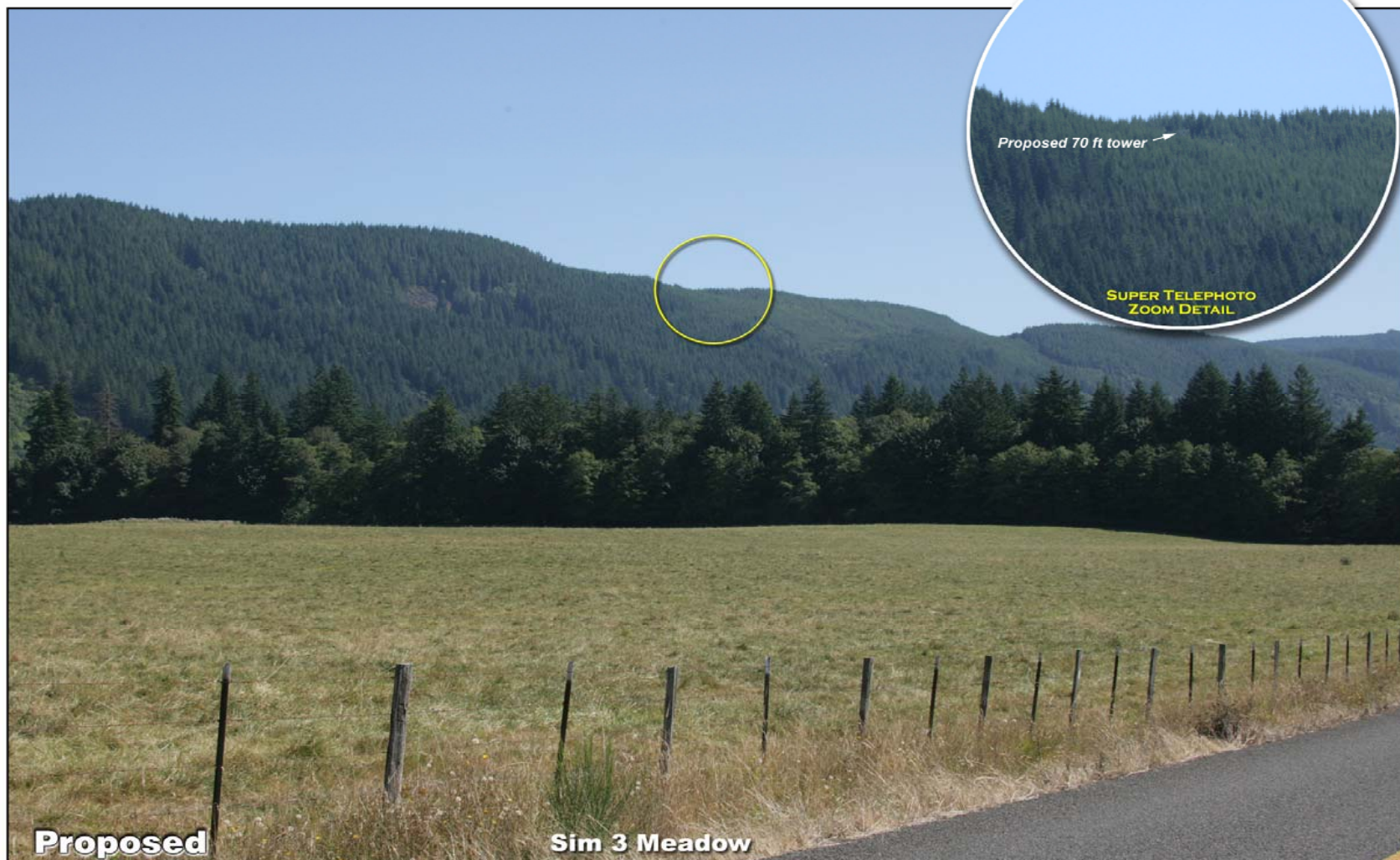
Date:

JANUARY 2006

APPENDIX:

A-2

Photosimulation of view looking northeast from the Meadow.



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

**VISUAL SIMULATION 3-MEADOW
PROPOSED ACTION
PROPOSED CLACKAMAS COUNTY COMMUNICATIONS SITE
Clackamas County, Oregon**

JPO Draw Down No:

038

Source:

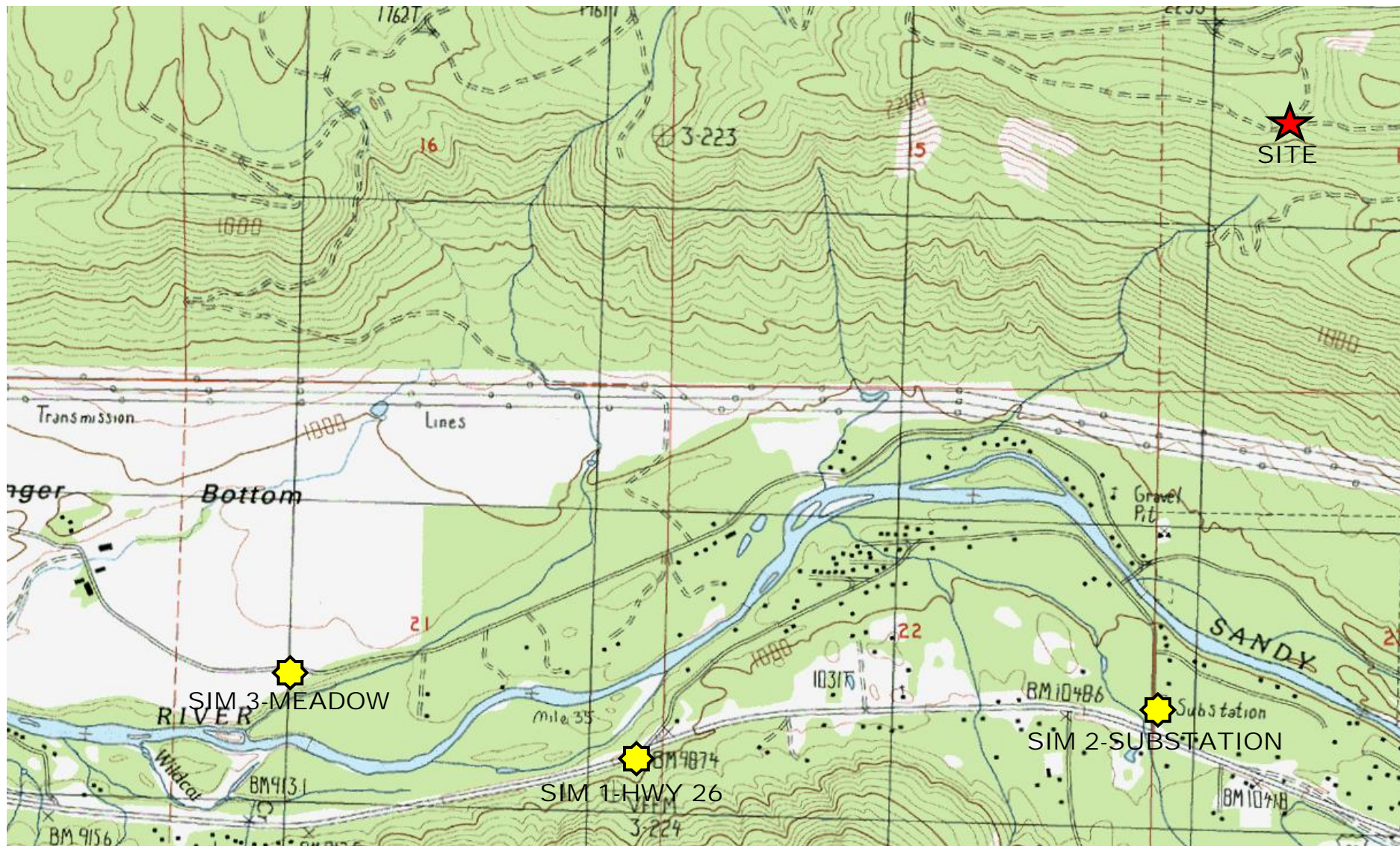
PreVisualists, Inc.

Date:

JANUARY 2006

APPENDIX:

A-3



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

VISUAL SIMULATION KEY OBSERVATION POINTS

PROPOSED CLACKAMAS COUNTY COMMUNICATIONS SITE Clackamas County, Oregon

JPO Draw Down No:

038

Source:

EYAKTEK and USGS TOPOGRAPHIC MAP (BRIGHTWOOD, OR)

Date:

JANUARY 2006

APPENDIX:

A-4

NOVEMBER 21, 2006

**Photosimulation of view looking northeast from Hwy 26
at the westernmost junction of E Sleepy Hollow.**



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

**VISUAL SIMULATION 1-HWY 26
ACTION ALTERNATIVE
PROPOSED CLACKAMAS COUNTY COMMUNICATIONS SITE
Clackamas County, Oregon**

JPO Draw Down No:

038

Source:

PreVisualists, Inc.

Date:

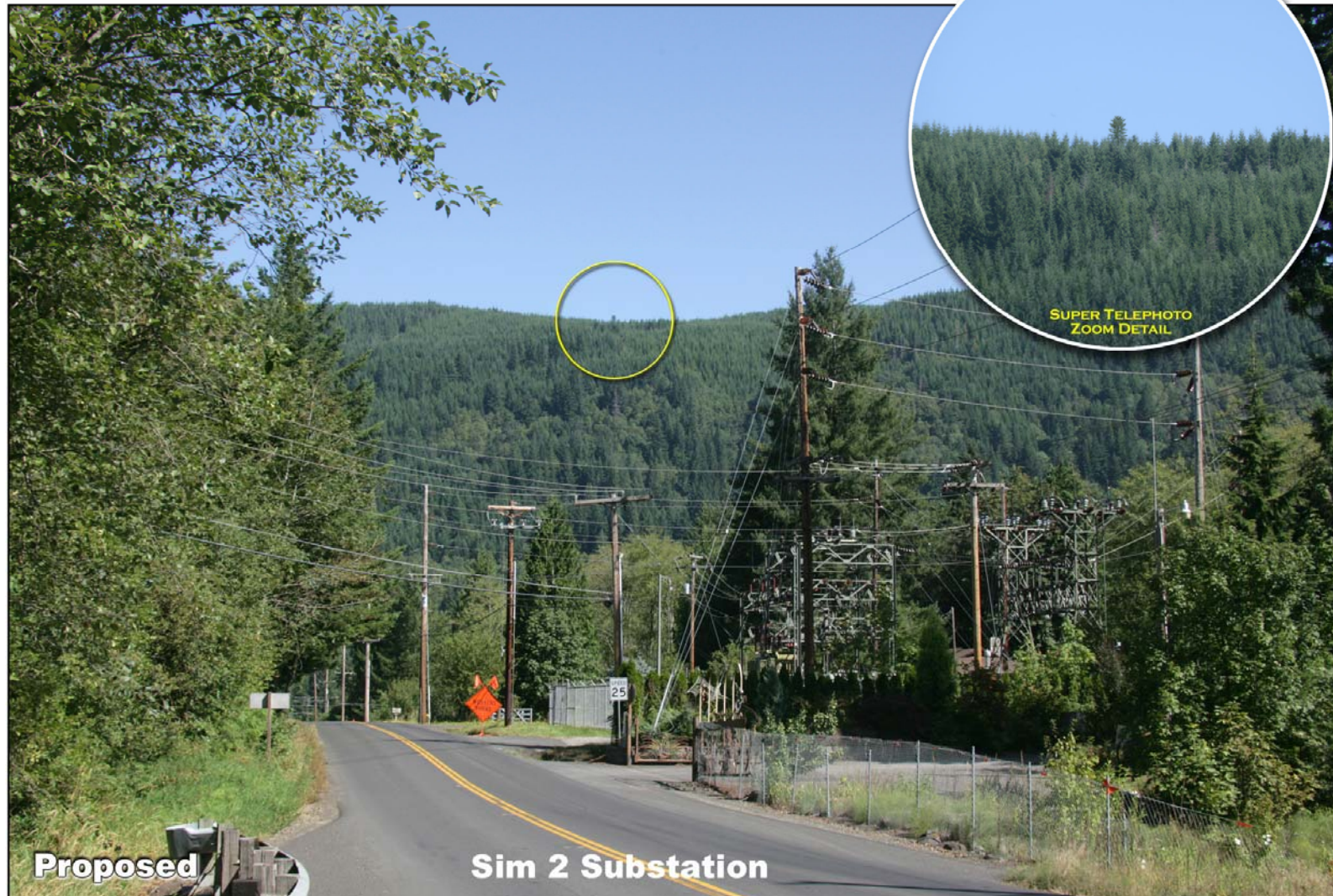
JANUARY 2006

APPENDIX:

A-1

**Photosimulation of view looking northeast from Hwy 26
at the easternmost junction of E Sleepy Hollow.**

NOVEMBER 21, 2005



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

**VISUAL SIMULATION 2-SUBSTATION
ACTION ALTERNATIVE
PROPOSED CLACKAMAS COUNTY COMMUNICATIONS SITE
Clackamas County, Oregon**

JPO Draw Down No:

038

Source:

PreVisualists, Inc.

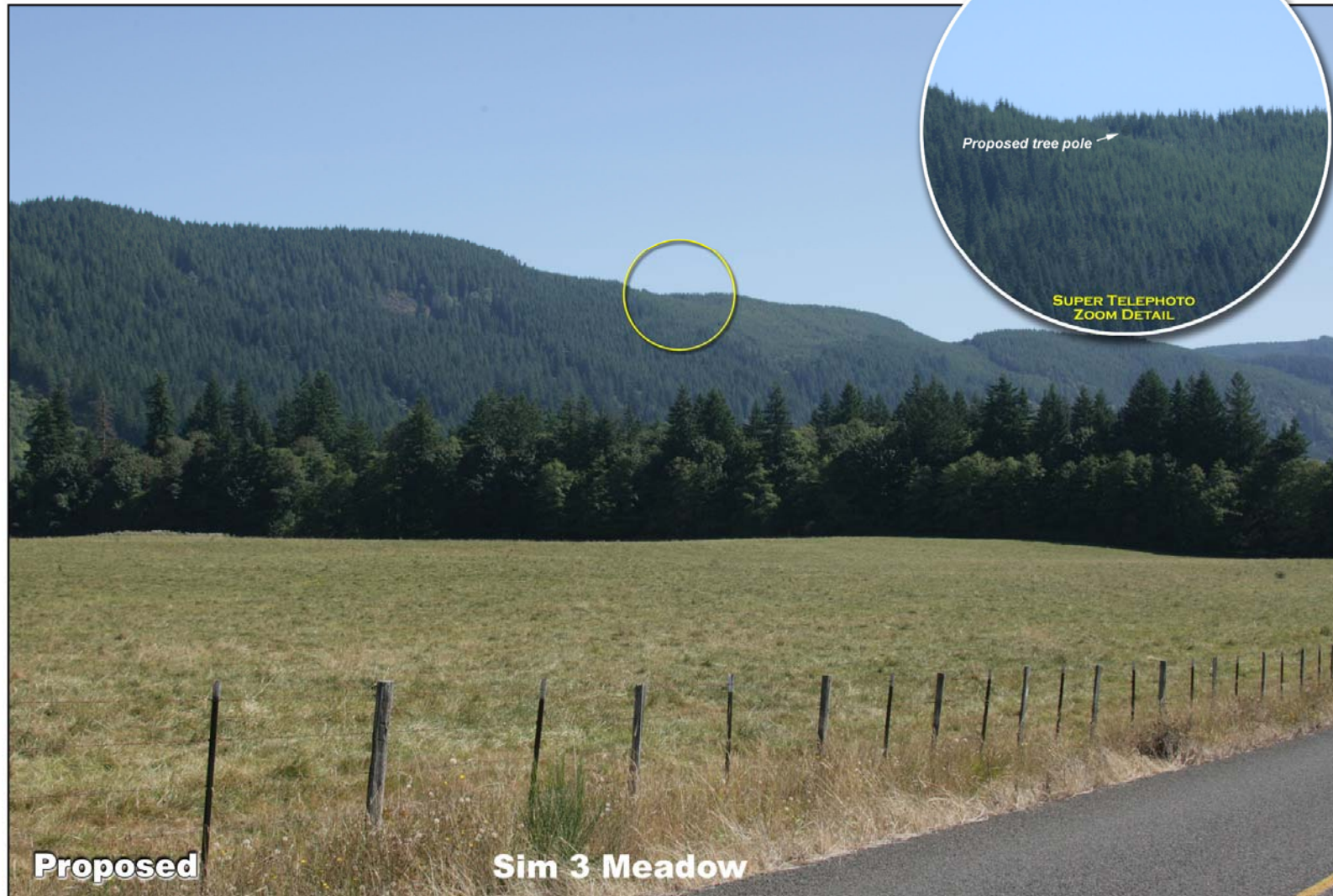
Date:

JANUARY 2006

APPENDIX:

A-6

Photosimulation of view looking northeast from the Meadow.



1881 Campus Commons Drive
St. 105
Reston, Virginia 20191
703-481-0050
www.eyaktek.com

**VISUAL SIMULATION 3-MEADOW
ACTION ALTERNATIVE
PROPOSED CLACKAMAS COUNTY COMMUNICATIONS SITE
Clackamas County, Oregon**

JPO Draw Down No:

038

Source:

PreVisualists, Inc.

Date:

JANUARY 2006

APPENDIX:

A-7