



CRGNSA CONSISTENCY DETERMINATION
HAYSTACK BUTTE RADIO TOWER, CD-15-02-G
BONNEVILLE POWER ADMINISTRATION
T02N, R15E, S3
COLUMBIA RIVER GORGE NATIONAL SCENIC AREA
KLICKITAT COUNTY, WASHINGTON
OCTOBER 22, 2015

BACKGROUND

The proposed development of a new 80-foot radio tower and associated 600 square foot equipment building by Bonneville Power Administration (BPA) is required to be consistent with the purposes of the Columbia River Gorge National Scenic Area Act as determined by the Forest Service pursuant to Section 14(d) of the Columbia River Gorge National Scenic Area Act (16 USC 544). Because the proposal involves the construction of new facilities, the proposal does not fall within Savings Provision 6 of section 17 of the Scenic Area Act, and is not exempt from Scenic Area review. A consistency review application was received my office in November 2014. Additional information concerning proposed road maintenance and improvements was received in February 2015, at which point the application was considered complete.

DECISION

I find that the above proposal is consistent with the Columbia River Gorge National Scenic Area (CRGNSA) Management Plan provided that it is implemented as described in the application materials, the CRGNSA Consistency Determination Findings of Fact, referenced as CD-15-02-G, and provided the following required conditions are applied:

1. Should any historic or prehistoric cultural resources be uncovered during project activities, the applicant shall cease work and immediately notify the CRGNSA office and the Washington Office of Archeology and Historical Preservation. The applicant will also notify the Indian Tribal governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.
2. Any imported fill material will closely match the surrounding earth colors.
3. The tower and antennae shall not exceed 80 feet in height. The tower and any attached equipment such as microwave dishes shall be of a matte pale grey color to disappear as much as possible into the sky background
4. All exterior building materials, including tower footings, screening fence, and the paint on the propane tank, shall be a neutral, non-reflective matte brown color that will blend into the surrounding landscape. The building roof should be of non-reflective material

- (not metal or texturized metal). Any exterior glazing will be of low or non-reflective material or be treated or covered to be non-reflective.
5. Roofing and exterior paint/color samples will be submitted to the USFS Landscape Architect for approval prior to commencement of construction.
 6. Additional required conditions relevant to cultural resources have been provided in a separate letter to the applicant.

ADMINISTRATIVE REVIEW OPPORTUNITIES

A written request for review of the Consistency Determination, with reasons to support the request, must be received within 20 days of the date shown with the Area Manager signature below. Requests for review should be addressed to: Request for Review, Regional Forester, P.O. Box 3623, Portland, OR 97208.

IMPLEMENTATION DATE

This project may begin immediately as long as it complies with the conditions as described in items 1 through 6 above. This decision expires two years after the date on this determination. If implementation has not commenced before that date, a new consistency review or request for extension shall be required.

CONTACT

The Columbia River Gorge National Scenic Area staff prepared an analysis file in conjunction with this project. For further information, contact Robin Shoal at the Columbia River Gorge National Scenic Area, phone: (541) 308-1716, e-mail: rshoal@fs.fed.us.



LYNN BURDITT

10/23/2015

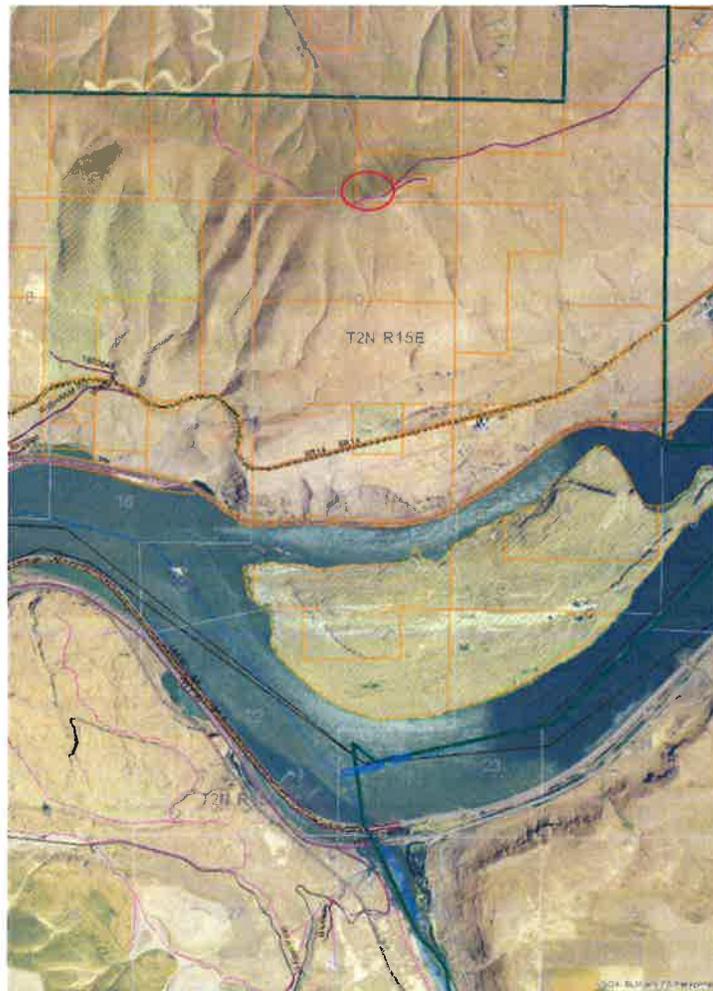
Date

Area Manager, Columbia River Gorge National Scenic Area

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FINDINGS OF FACT

LANDOWNER	Hall, Scott
PROPOSED ACTION	Construction of a 80-foot radio tower and associated 600 square foot equipment building, installation of a propane tank, and maintenance and improvements to a shared access road.
LOCATION	Township Range Section: T02N, R12 E, S03 SE Tax lot ID: 021503000000600 Klickitat County, WA
NATIONAL SCENIC AREA DESIGNATION	GMA
LAND USE DESIGNATION	GMA Agriculture A-1
LANDSCAPE SETTING	Grasslands



Vicinity map - project area is within red circle.

FINDINGS OF FACT:

The following findings of fact contain the applicable standards and guidelines from the CRGNSA Management Plan. The Management Plan, as adopted in 2004 and updated in 2011, is in effect. The CRGNSA Management Plan standards and guidelines are displayed in regular type. The findings are displayed in **bold type**.

A. PUBLIC COMMENT

A notice describing the project was sent to a mailing list of known interested parties and adjacent landowners on July 31, 2015. A period of 22 days was allowed for public comment. No comments were received.

B. PROJECT PROPOSAL

Bonneville Power Administration (BPA) proposes to construct a new 80-foot tall radio tower and build a new 600 square foot building on a 0.2-acre BPA-acquired parcel on Haystack Butte, in Klickitat County, Washington. The location is approximately 150 feet from the site of the existing BPA Haystack Butte radio station. The proposed 600 square foot building would be constructed of concrete masonry units (CMUs) with a wood-framed gable roof. The proposal includes the installation of a propane tank as a fuel source for a back-up generator; installation of an electrical service; relocation of an existing shared access road; and maintenance and improvements to the existing access road leading to the site from the northeast.

The proposed radio/equipment station building would house batteries, communication racks, a generator, and an HVAC system. To relocate the existing shared access road some fill material would be imported to the site and used as bedding/base. Formal landscaping is not proposed due to the lack of water, wind conditions, and the lack of existing vegetation other than dryland grasses the site. Some low, screening fencing is proposed to the south and northeast of the building.

Once the new site is acquired and the physical improvements are completed, new digital radios would be installed in the new building and new microwave antennas would be installed on the new tower to provide digital communication paths from the Haystack Radio site to the existing Big Eddy and Rock Creek substations. It is the intent of BPA to remove the existing building and tower when all of the equipment there has been retired. If requested and properly approved, the existing facility could be turned over to the tribal land owners for their use.

C. LAND USE DESIGNATIONS

The project site is within the General Management Area (GMA). The Land Use Designation is Agriculture A-1.

The Management Plan, Part II, Chapter 1 Agricultural Land, GMA Guidelines, states:

2. The following uses may be allowed on lands designated Large-Scale or Small--Scale

Agriculture, subject to compliance with the guidelines for the protection of scenic, cultural, natural and recreation resources and the “Approval Criteria for Specified Review Uses” below.

A. Utility facilities and railroads necessary for public service upon a showing that (1) there is no practicable alternative location with less adverse effect on agricultural or forest lands, and (2) the size is the minimum necessary to provide the service.

Approval Criteria for Specified Review Uses

1. The uses identified under Guideline 2 under “Review Uses,” above, may be allowed only if they meet both of the following criteria:

- A. The use is compatible with agricultural uses and would not force a change in or significantly increase the cost of accepted agricultural practices on nearby lands devoted to agricultural use.
- B. The use will be sited to minimize the loss of land suitable for the production of crops or livestock.

Findings: The proposed utility facility qualifies as a review use. The selected location is within a cluster of existing similar structures. Siting the proposed development in this location minimizes adverse effects to surrounding agricultural lands. The proposed tower and equipment building are considered to be the minimum size necessary to provide the required service. The project will not result in a change to agricultural practices on nearby lands.

D. SCENIC RESOURCES

The Management Plan, Part II, Chapter 1 (Scenic Resources), GMA guidelines, states:

1. New buildings and roads shall be sited and designed to retain the existing topography and to minimize grading activities to the maximum extent practicable.
2. New buildings shall be compatible with the general scale (height, dimensions and overall mass) of existing nearby development. Expansion of existing development shall comply with this guideline to the maximum extent practicable.
3. Project applicants shall be responsible for the proper maintenance and survival of any planted vegetation required by the guidelines in this chapter.
4. A site plan and land use application shall be submitted for all new buildings, except for buildings smaller than 60 square feet in area and less than or equal to 10 feet in height, as measured at the roof peak. The site plan and application shall include all information required in the site plan guidelines in "Review Uses" (Part II, Chapter 7: General Policies and Guidelines). Supplemental requirements for developments proposed on lands visible from key viewing areas are included in the key viewing areas guidelines in this chapter.
5. For all proposed development, the determination of compatibility with the landscape setting shall be based on information submitted in the site plan.

Findings:

1.) The proposed building, tower, and road improvements involve minimal grading. The building and tower and their immediate access road will be located on an existing, disturbed, level area. Road improvements will be to an existing road and will remain

within the existing roadway. Grading activities are minimized and the existing topography will be retained.

2.) The proposed new building is of a similar scale to other buildings already in the immediate area. The proposed new 80' lattice-style tower is similar in height and style to other towers already existing on the site, which range from 12' to 103' tall. *A recommended condition of approval is that all exterior building materials, including tower footings and the paint on the propane tank, be a neutral, non-reflective matte brown color that will blend into the surrounding landscape, and that the tower and any attached equipment such as microwave dishes be of a matte pale grey color to disappear as much as possible into the sky background. The roof should be of non-reflective material (not metal or texturized metal).*

3.) Due to the dry, sparsely vegetated nature of the site and landscape setting, no landscaping is proposed or required. *A recommended condition of approval is that all rock used be of material that to the greatest extent possible matches the color of the surrounding landscape.*

4.) and 5.) A site plan was submitted and was used to determine project compatibility with the landscape setting.

Key Viewing Areas

GMA Guidelines

1. The guidelines in this section shall apply to proposed developments on sites topographically visible from key viewing areas.

Finding: Haystack Butte site is topographically visible in the background from portions of three Key Viewing Areas: I-84 between mileposts 80.5 and 115; the Columbia River (similar to I-84); and portions of WA State Route 14. Key Viewing Area guidelines apply.

2. Each development shall be visually subordinate to its setting as seen from key viewing areas.

Finding: While Haystack Butte is topographically visible from Dog Mountain and portions of WA State Route 142, the distances are so great (38 miles for Dog Mountain, 11 to 13 miles for State Route 142) that the proposed development is not visible from those KVAs. The closest KVA is Hwy 14, about 1.3 miles.

The tower and building will be located within a cluster of similar towers and associated small buildings already present on the site. With the recommended conditions of approval the tower and building will be visually subordinate as seen from key viewing areas. The access road is topographically screened and not visible from any KVAs.

3. Determination of potential visual effects and compliance with visual subordination policies shall include consideration of the cumulative effects of proposed developments.

Potentially Adversely Affected Resource within Project Area

The scenic resource affected by this proposal is the Grassland setting within portions of the viewsheds of I-84, WA State Route 14, and the Columbia River. The proposed tower and

building are permanent developments, so the temporal boundary is from the present indefinitely into the future.

Past Actions

The cumulative effects analysis includes an analysis of past actions by including them in the assessment of current conditions. Current conditions within the Columbia River Gorge have been impacted by innumerable actions over the last century (and beyond), and trying to isolate the individual actions that continue to have residual impacts would be nearly impossible. Providing the details of past actions on an individual basis would not be useful to predict the cumulative effects of the proposed action or alternatives. Focusing on individual actions would be less accurate than looking at existing conditions, because there is limited information on the environmental impacts of individual past actions, and one cannot reasonably identify each and every action over the last century that has contributed to current conditions. Additionally, focusing on the impacts of past human actions risks ignoring the important residual effects of past natural events, which may contribute to cumulative effects just as much as human actions. The current conditions serve as an aggregate of all past actions, so by looking at current conditions, we are sure to capture all the residual effects of past human actions and natural events, regardless of which particular action or event contributed those effects.

Present Actions

Existing cluster of communications towers and equipment buildings on Haystack Butte; existing utility corridor in the middleground; grazing; limited agriculture.

Reasonably Foreseeable Future Actions

Grazing; limited agriculture; operation and maintenance of existing communication sites, utility corridors, and access roads; occasional grass fires.

Cumulative Impacts

Past and present development activities have not greatly changed the visual character of this landscape within the Scenic Area. Due to Scenic Area Management Plan guidelines, present and reasonably foreseeable activities will likely continue to be visually subordinate. The effects of the current proposal, combined with ongoing and reasonably foreseeable future actions, would not contribute to the incremental modification of the integrity of the grassland setting as observed by the casual observer.

Finding: The proposal added to past, present and reasonably foreseeable future actions would not result in cumulatively significant impacts to scenic resources.

4. The extent and type of conditions applied to a proposed development to achieve visual subordination shall be proportionate to its potential visual impacts as seen from key viewing areas.
 - A. Decisions shall include written findings addressing the factors influencing potential visual impact, including but not limited to:
 - (1) The amount of area of the building site exposed to key viewing areas.
 - (2) The degree of existing vegetation providing screening.
 - (3) The distance from the building site to the key viewing areas from which it is visible.

- (4) The number of key viewing areas from which it is visible.
 - (5) The linear distance along the key viewing areas from which the building site is visible (for linear key viewing areas, such as roads).
- B. Conditions may be applied to various elements of proposed developments to ensure they are visually subordinate to their setting as seen from key viewing areas, including but not limited to:
- (1) Siting (location of development on the subject property, building orientation, and other elements).
 - (2) Retention of existing vegetation.
 - (3) Design (color, reflectivity, size, shape, height, architectural and design details and other elements).
 - (4) New landscaping.
5. New development shall be sited to achieve visual subordination from key viewing areas, unless the siting would place such development in a buffer specified for protection of wetlands, riparian corridors, sensitive plants, or sensitive wildlife sites or would conflict with guidelines to protect cultural resources. In such situations, development shall comply with this guideline to the maximum extent practicable.
 6. New development shall be sited using existing topography and/or existing vegetation as needed to achieve visual subordination from key viewing areas.
 7. Existing tree cover screening proposed development from key viewing areas shall be retained as specified in the Landscape Settings Design Guidelines section of this chapter.
- Findings 4 through 7: The new building and tower are located within an existing cluster of similar structures, which minimizes their potential visual impact. See the end of the Scenic Resources section for recommended mitigations (conditions) to achieve visual subordination. The site is not within or near any natural resource buffers. See the Cultural Resources section for a discussion of cultural resource mitigations. In the Grassland landscape setting there is no existing tree cover to retain. Existing topography screens the site from portions of the affected KVAs.**
8. The silhouette of new buildings shall remain below the skyline of a bluff, cliff, or ridge as seen from key viewing areas. Variances to this guideline may be granted if application of the guideline would leave the owner without a reasonable economic use. The variance shall be the minimum necessary to allow the use and may be applied only after all reasonable efforts to modify the design, building height, and site to comply with the guideline have been made.
- Finding: The new tower will break the skyline. However, it will be located within a cluster of other existing, similar towers that currently break the skyline. The new tower will be 80 feet tall, and is within the scale of the other towers on the site, of which the tallest is 103 feet in height. The new tower will not increase the visual effects of the current condition.**
12. Unless expressly exempted by other provisions in this chapter, colors of structures on sites visible from key viewing areas shall be dark earth-tones found at the specific site or in the surrounding landscape. The specific colors or list of acceptable colors shall be included as a condition of approval. The Scenic Resources Implementation Handbook will include a recommended palette of colors.

13. The exterior of buildings on lands seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity, unless the structure would be fully screened from all key viewing areas by existing topographic features. The Scenic Resources Implementation Handbook will include a list of recommended exterior materials. These recommended materials and other materials may be deemed consistent with this guideline, including those where the specific application meets recommended thresholds in the "Visibility and Reflectivity Matrices" in the Implementation Handbook (once they are created). Continuous surfaces of glass unscreened from key viewing areas shall be limited to ensure visual subordination. Recommended square footage limitations for such surfaces will be provided for guidance in the Implementation Handbook.
14. In addition to the site plan requirements in "Review Uses" (Part II, Chapter 7: General Policies and Guidelines), applications for all buildings visible from key viewing areas shall include a description of the proposed building(s)' height, shape, color, exterior building materials, exterior lighting, and landscaping details (type of plants used; number, size, locations of plantings; and any irrigation provisions or other measures to ensure the survival of landscaping planted for screening purposes).

Findings 12-14: See the recommended mitigations (conditions of approval) elsewhere in the Scenic Resources section. The applicant submitted a full description of the proposed building.

16. Exterior lighting shall be directed downward and sited, hooded, and shielded such that it is not highly visible from key viewing areas. Shielding and hooding materials shall be composed of non-reflective, opaque materials.

Finding: No exterior lighting is proposed.

20. New communication facilities (antennae, dishes, etc.) on lands visible from key viewing areas that require an open and unobstructed site shall be built upon existing facilities unless it can be demonstrated that use of existing facilities is not practicable.

Finding: The intent of this proposal is to relocate and modernize the existing BPA radio tower to this new location. BPA has demonstrated that it is not practicable to co-locate its needed facilities on other existing structures on the site.

21. New communications facilities may protrude above a skyline visible from a key viewing area only upon demonstration that:

- A. The facility is necessary for public service,
- B. The break in the skyline is seen only in the background, and
- C. The break in the skyline is the minimum necessary to provide the service.

Finding: All three conditions are met in the current proposal.

Landscape Settings

Design Guidelines for Grassland Landscape Setting

1. Accessory structures, outbuildings, and access ways shall be clustered together as much as possible. Exceptions to this guideline are permitted where necessary for farming operations.
2. In portions of this setting visible from key viewing areas, the following guidelines shall be

employed to achieve visual subordination for new development and expansion of existing development:

- A. Structures shall be sited on portions of the property that provide maximum screening from key viewing areas, using existing topographic features.
- B. Lower structures that emphasize horizontal lines and blend with this sweeping landscape should be encouraged rather than very tall structures.
- C. Planting of trees for screening shall not be extensive, in character with the openness of this setting. Where used, screening vegetation shall either tie in with nearby riparian vegetation in seasonal drainages or emulate windrows. At least half of any trees planted for screening purposes shall be species native to the setting or commonly found in the area. Such species include Oregon white oak, Lombardy poplar, black locust, black cottonwood (wet locations), Russian olive and ponderosa pine.

Findings: The proposed tower and building are sited within an existing cluster of similar communications structures. This location and the recommended mitigations elsewhere in the Scenic Resources section will ensure visual subordination. The planting of screening trees would not be appropriate for this site and is not proposed.

Scenic Corridors

GMA Guidelines

Findings: Scenic corridor guidelines do not apply to this project.

Signs

GMA Guidelines

Findings: No signs are proposed. Sign guidelines do not apply to this project.

E. CULTURAL RESOURCES

The Management Plan, Part II, Chapter 2 (Cultural Resources), GMA Policies, states:

3. A four-step process shall be used to protect cultural resources: performing cultural resource reconnaissance or historic surveys before proposed uses are authorized; assessing the effects of proposed uses on significant cultural resources; and preparing mitigation plans to avoid or minimize impacts to significant cultural resources.
14. Mitigation measures shall ensure that a proposed use would have no adverse effect on significant cultural resources. Uses that would adversely affect significant cultural resources shall be prohibited.

The Management Plan, Part II, Chapter 2 (Cultural Resources), GMA Guidelines, states:

Determination of potential effects to significant cultural resources shall include consideration of cumulative effects of proposed developments that are subject to any of the following: 1) a reconnaissance or historic survey; 2) a determination of significance; 3) an assessment of effect; or 4) a mitigation plan. *(Added: CRGC adoption 7/13/10; U.S. Sec. Ag. concurrence 11/1/10)*

Findings: The proposed project has been reviewed by a Forest Service archaeologist for consistency with the GMA guidelines. Cultural resource surveys were completed in 2014 and 2015, and reported by BPA and the Yakama Nation Cultural Resource Program. Taken in combination, the cultural resource surveys conducted in 2014 and 2015, and the avoidance and monitoring recommendations contained in the 2015 report provided sufficient information to assess the effects of this project. It was determined, and concurred by SHPO, that there will be no adverse impact to cultural resources if the mitigations described in the 2015 report are applied as conditions to the project. Those mitigations are recommended as conditions as approval, and have been provided in a separate letter to the applicant.

A condition should be placed stating that should any historic or prehistoric cultural resources be uncovered during project activities, the applicant shall cease work and immediately notify the USFS CRGNSA office and the Washington Office of Archeology and Historical Preservation. The applicant should also notify the Indian Tribal governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.

The proposal will have no adverse effects to cultural resources; therefore, there will be no unresolved adverse cumulative effects on significant cultural resources within the Columbia River Gorge National Scenic Area.

Cultural Resources Discovered After Construction Begins

1. The following procedures shall be effected when cultural resources are discovered during construction activities. All survey and evaluation reports and mitigation plans shall be submitted to the local government and the SHPO. Indian tribal governments also shall receive a copy of all reports and plans if the cultural resources are prehistoric or otherwise associated with Native Americans.
 - A. Halt of Construction. All construction activities within 100 feet of the discovered cultural resource shall cease. The cultural resources shall remain as found; further disturbance is prohibited.
 - B. Notification. The project applicant shall notify the local government and the Gorge Commission within 24 hours of the discovery. If the cultural resources are prehistoric or otherwise associated with Native Americans, the project applicant shall also notify the Indian tribal governments within 24 hours.
 - C. Survey and Evaluation. The Gorge Commission shall survey the cultural resources after obtaining written permission from the landowner and appropriate permits from the SHPO. (See Oregon Revised Statute [ORS] [273.705](#), [ORS 358.905 to 358.955](#), and Revised Code of Washington [RCW] [27.53](#)). It shall gather enough information to evaluate the significance of the cultural resources. The survey and evaluation shall be documented in a report that generally follows the guidelines in the "Reconnaissance Survey Reports--Large-Scale Uses" and

"Evaluation of Significance: Evaluation Criteria and Information Needs" sections of this chapter.

Based on the survey and evaluation report and any written comments, the local government shall make a final decision on whether the resources are significant. Construction activities may recommence if the cultural resources are not significant.

A mitigation plan shall be prepared if the affected cultural resources are significant.

- D. Mitigation Plan. Mitigation plans shall be prepared according to the information, consultation, and report guidelines contained in the "Mitigation Plans: Mitigation Plan Criteria and Information Needs" section of this chapter. Construction activities may recommence when the conditions in the mitigation plan have been executed.

Discovery of Human Remains

1. The following procedures shall be effected when human remains are discovered during a cultural resource survey or during construction. Human remains means articulated or disarticulated human skeletal remains, bones, or teeth, with or without attendant burial artifacts.

- A. Halt of Activities. All survey, excavation, and construction activities shall cease. The human remains shall not be disturbed any further.
- B. Notification. Local law enforcement officials, the local government, the Gorge Commission, and the Indian tribal governments shall be contacted immediately. In Washington, the state forensic physical anthropologist shall also be notified.
- C. Inspection. The county coroner, or appropriate official, shall inspect the remains at the project site and determine if they are prehistoric/historic or modern. Representatives from the Indian tribal governments shall have an opportunity to monitor the inspection.
- D. Jurisdiction. If the remains are modern, the appropriate law enforcement officials shall assume jurisdiction and the cultural resource protection process may conclude.
- E. Treatment. In Oregon, prehistoric/historic remains of Native Americans shall generally be treated in accordance with the procedures set forth in [ORS 97.740 to 97.760](#). In Washington, the procedures set forth in RCW [27.44](#) and [68.05](#) shall generally be implemented if the remains are prehistoric/historic.

If the human remains will be reinterred or preserved in their original position, a mitigation plan shall be prepared in accordance with the consultation and report requirements specified in the "Mitigation Plans: Mitigation Plan Criteria and Information Needs" section of this chapter.

The mitigation plan shall accommodate the cultural and religious concerns of Native Americans. The cultural resource protection process may conclude when the conditions set forth in the "Mitigation Plans: Conclusion of the Cultural Resource Protection Process" section of this chapter are met and the mitigation plan is executed.

F. NATURAL RESOURCES

The Management Plan, Part II, Chapter 3 (Natural Resources), GMA guidelines, states:

Wetlands

Finding: There are no wetlands or wetland buffers in the vicinity of the project. Wetlands guidelines do not apply.

Streams, Ponds, Lakes, And Riparian Areas

Finding: There are no streams, ponds, lakes, riparian areas, or associated buffers in the vicinity of the project. These guidelines do not apply.

Wildlife Habitat

GMA Guidelines

Review Uses

1. Except uses allowed outright, proposed uses may be allowed within 1,000 feet of a sensitive wildlife area or site, subject to compliance with guidelines for the protection of scenic, natural, cultural, and recreation resources and "Approval Criteria for Review Uses Near Sensitive Wildlife Areas and Sites" in this section. Updated lists of species included in sensitive wildlife sites can be found on the websites for the Washington Department of Fish and Wildlife (Species of Concern list) and the Wildlife Division of Oregon Department of Fish and Wildlife. A list also is maintained by the USDA Forest Service – Scenic Area Office and available at the Gorge Commission office and on its website.

Finding: The project site is not within 1000 feet of a sensitive wildlife area or site. Sensitive wildlife area/site guidelines do not apply.

Approval Criteria for Fences in Deer and Elk Winter Range

Finding: The project site is not within Deer and Elk Winter Range. These criteria do not apply.

Rare Plants

Finding: The project site is not within 1000 feet of a sensitive plant area or site. Sensitive plant guidelines do not apply.

G. RECREATION RESOURCES

The Management Plan, Part II, Chapter 4 (Recreation Resources), GMA guidelines, state:

Allowable Uses

The following uses are allowable, subject to compliance with the "Approval Criteria for Recreation Uses" and "Facility Design Guidelines For All Recreation Projects" in this section.

1. Recreation Intensity Class 1 (Very Low Intensity)
 - A. Parking areas for a maximum of 10 cars for any allowed uses in Recreation Intensity Class 1.
 - B. Trails for hiking, equestrian, and mountain biking use.
 - C. Pathways for pedestrian and bicycling use.
 - D. Trailheads (with provisions for hitching rails and equestrian trailers at trailheads accommodating equestrian use).
 - E. Scenic viewpoints and overlooks.
 - F. Wildlife/botanical viewing and nature study areas.
 - G. River access areas.
 - H. Simple interpretive signs and/or displays, not to exceed a total of 50 square feet.
 - I. Entry name signs, not to exceed 10 square feet per sign.
 - J. Boat docks, piers, or wharfs.
 - K. Picnic areas.
 - L. Restrooms/comfort facilities.

**Finding: The project area is within Recreation Intensity Class 1. No recreation uses are proposed. Recreation Uses guidelines do not apply.
The project will have no adverse effects to recreation resources.**

H. CONCLUSION

The proposed communications tower and equipment building are consistent with the National Scenic Area Management Plan Policy and Guidelines provided they meet the criteria and conditions listed in the Findings of Fact and Consistency Determination.