USDA United States Department of Agriculture
Forest Service
Columbia River Gorge National Scenic Area
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File Code: 1900
CD-11-03-S
Date: May 24, 2011

Fred Walasavage
Bonneville Power Administration
3920 Columbia View Dr
The Dalles, Oregon 97058

The consistency review of the emergency transmission tower replacement and access road improvements has been completed. Your agency 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 Act. Application for a consistency review was made to this office and deemed complete on January 12, 2011.

I find this project to be consistent with the Columbia River Gorge National Scenic Area (CRGNSA) Management Plan provided that it is implemented as described in the CRGNSA Consistency Determination Findings of Fact, referenced as CD-11-03-S.

Implementation Date: These emergency/ disaster actions were taken in November 2010. No future actions are proposed.

Appeal 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.

Contact Person: The Columbia River Gorge National Scenic Area staff prepared an analysis file in conjunction with this project. For further information, contact Christine Plourde at the Columbia River Gorge National Scenic Area, phone: (541) 308-1713, e-mail: cplourde@fs.fed.us.

Sincerely,

Daniel T. Harkenrider

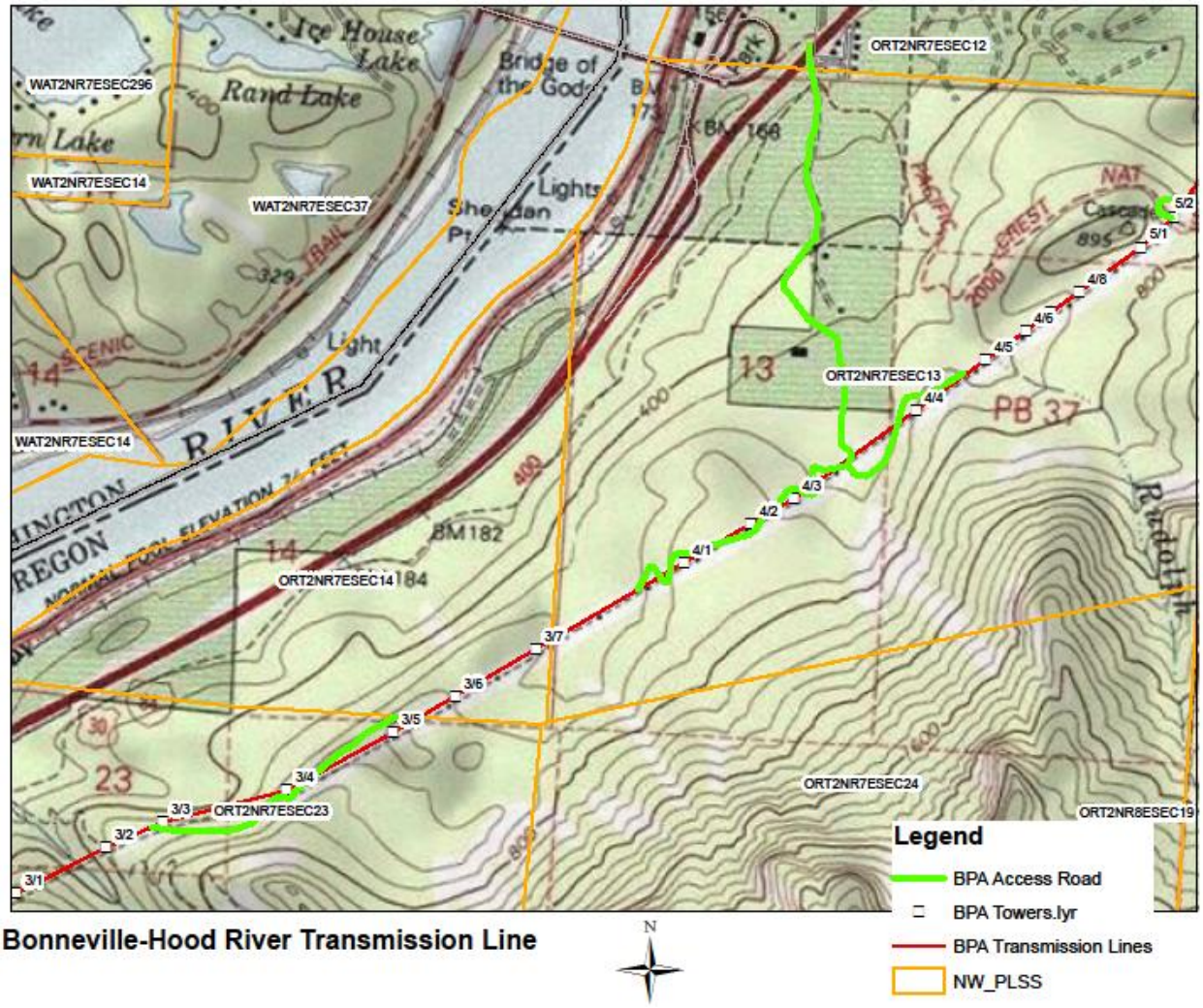
DANIEL T. HARKENRIDER
Area Manager

Enclosure: Findings of Fact

cc:
Jill Arens, Executive Director, Columbia River Gorge Commission,
Rick Till, Friends of the Columbia Gorge,

FINDINGS OF FACT

LANDOWNER:	U. S. Forest Service, Bonneville Power Administration
PROPOSED ACTION:	After Action Emergency Response Review
LOCATION:	Township 2N, Range 7E, Sections 13, 14 and 23 Tax lot ID: 02N07E00300, 02N07E1300100 UTM: 451176, 1288480
NATIONAL SCENIC AREA DESIGNATION:	SMA
LAND USE DESIGNATION:	Open Space
LANDSCAPE SETTING	Gorge Walls, Canyon lands and wild lands, Coniferous Woodland



FINDINGS OF FACT:

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

A. Public Comment

A period of 30 days was allowed for public comment. The project was opened for public comment for an additional 30 days due to significant changes. One comment was received from the Friends of the Gorge in regards to following the applicable standards and guidelines for Emergency/ Disaster actions. The appropriate guidelines are addressed in the following Findings of Fact.

B. Emergency Actions

Background

On 11/27/10, a 24" (Diameter at Breast Height) x 90' tall Doug Fir tree blew over and came to rest on the 3rd position of the Bonneville-Hood River 115 kV line between structures 3/1-3/2. The resulting impact of the tree seriously damaged structures 3/2 and 3/3, twisting the steel lattice structures and cross arms. The line was out of service leaving Cascade Locks, OR without power for approximately 4 hours. On 11/29/10, TLM removed the tree from the line and began to assemble equipment to replace the damaged steel structures with wood pole structures. The November weather conditions in the Gorge had been very turbulent with high wind, ice and snow storms and above average rainfall. The ground was saturated and the potential for experiencing another outage in this area was high. Cascade Locks has only a radial feed line supporting its power needs at this time and if something happened to that line, the City would likely sustain a very long term outage. Therefore, rapid emergency response efforts were necessary.

The access to structures 3/2 & 3/3 is approximately 1.5 miles from the closest paved road. The existing access road surface is mostly native surface (clay) and traverses over steep slopes and switchbacks. For BPA to have the ability to remove the damaged structures and replace with new wood pole structures, several large heavy pieces of equipment needed access to the site including work trucks, boom trucks, cranes, track hoes, and a track mounted driller to bore holes to set the new poles. The condition of the road at that time would not sustain the weight of these vehicles due to the wet weather conditions. The native surface soil is mostly clay which becomes extremely slick when wet and does not provide for safe travel over the roadway with work vehicles. Another impact of wet native surface roads is they become inaccessible almost immediately due to ruts and holes created with minor use.

Emergency Response Actions

In response to these conditions, BPA hired a contractor to improve the road surface from the beginning of the access road to structure 4/2, so that safe and reliable access could be provided. On December 7, 2010, the road contractor mobilized on-site. The scope of the road work included placing rock, adding fabric where necessary, and rolling and grading the finished surface. Upon completion of these tasks, water bars were installed on the road and all disturbed

areas were seeded and covered with straw. As a part of the road work, two hair pin corners were widened to accommodate the large equipment and materials. Approximately eight trees were removed to support these actions. These two corners were located immediately to the west of Structure 4/2. BPA will continue to monitor conditions at the site and the contractor will return when the conditions are favorable to add more rock where necessary, stabilize the water bars, and apply more seed and straw as needed.

BPA crews then proceed to replace the steel lattice structures at 3/2 and 3/3. These structures were with cedar poles. Moderate ground disturbance was experienced in this area due to the trucks and equipment. The line is now restored and no further actions are planned for the transmission line.

C. Land Use Designations

The Management Plan, Part II, Chapter 7, Emergency/ Disaster Response Actions

1. General Guidelines
    a. Actions taken in response to an emergency/ disaster event, as defined in the Glossary, are allowed in all GMA/SMA land use designations, subject to the notification requirements in the following section (see "Notification Requirements").

Findings:
The emergency/ disaster response actions taken by BPA are consistent with the management plan definition of emergency/ disaster. BPA notified the Forest Service within the required time frame for emergency response actions.

D. Scenic Resources

1. Impacts of emergency/ disaster response actions shall be evaluated to ensure that scenic resources are not adversely affected… In the SMA, such actions shall meet the scenic standard to the greatest extent practicable.
2. Vegetation shall be used to screen or cover road cuts, structural development, landform alteration, and areas denuded of vegetation, as a result of emergency/ disaster response actions.
3. Areas denuded of vegetation as a result of emergency/ disaster response actions shall be revegetated with native plant species, or species commonly found within the applicable landscape setting, to restore the affected areas to its pre-response condition to the greatest extent practicable. Revegetation shall occur as soon as practicable, but no later than one year after the emergency/ disaster event.

Findings: The affected area was seeded with native herbaceous species and will be allowed to revegetate with native woody species.

4. The painting, staining or use of other materials on new structural development shall be used to ensure that the structures are non-reflective, or of low reflectivity , and visually

subordinate in their landscape setting as seen from key viewing areas, unless the structure is fully screened from key viewing areas by existing topographic features.

<u>Findings</u>: The scenic standard in the affected area is Not Visually Evident. The emergency response actions are visible from the foreground of the Pacific Crest National Scenic Trail and may be visible from the middleground or background of the HCRH, I-84, SR 14, Beacon Rock and the Columbia River.

Views of the Transmission Corridor did not meet Not Visually Evident scenic standard of the CRGNSA MP or Retention VQO of the Mt Hood LRMP prior to the emergency actions taken by BPA. Steel lattice structures were replaced with cedar structures which are of a material which is more consistent with the Gorge Walls, Canyon Lands and Wildlands landscape setting as cedar texture and color resembles materials in the forest. The steel towers contrast in color and texture with the surrounding forest. While the replacement towers are an improvement the transmission corridors will continue to not meet scenic standards and VQOs.

There are no cumulative effects with the replacement of these towers.

E. Cultural Resources

The Management Plan, Part I, Chapter 2 (Cultural Resources), states:
SMA/GMA Policies

1. New developments or land uses shall not adversely affect significant cultural resources.
7. The Forest Service shall be responsible for performing steps 1 through 5 under guideline 4 for forest practices and National Forest system lands.
8. The Forest Service shall consult with the Indian tribal governments and other consulting parties in performing steps 1 through 5 under guideline 4.

<u>Findings</u>: A cultural resource survey was completed (Brannon 2010). No cultural resources were found within the are of potential effect. This undertaking falls within the parameters of the Programmatic Agreement between the Oregon State Historic Preservation Office, ACHP and USFS. No further review is required. A courtesy copy of Brannon's report was send to SHPO and the consulting Tribes on April 14, 2011. A copy of the transmittal letter and the signed PA form are attached as part of the project record/file.

F. Natural Resources

1. To the greatest extent practicable, emergency/ disaster response actions shall not adversely affect natural resources.
2. Buffer zones of wetlands, streams, ponds, riparian areas, sensitive wildlife sites or areas, and sites containing rare plants, shall be the same as those established in the Natural Resources Chapter (Part I, Chapter 4).
3. Wetlands, Streams, Ponds, Lakes, Riparian Areas

Findings: **The project was not within the buffer of riparian resources. Erosion control measures were used.**

4. Wildlife Habitat

Findings: **Project was located in a right-of-way, disturbed, upland area, and was done in December during the non-breeding season. Resulting in no effects to wildlife or fish.**

5. Deer and Elk Winter Range

Findings: **No fences were erected as part of the emergency/ disaster response action.**

6. Rare Plants

Findings: **The project was not within the buffer of rare plant species. Disturbed soils were seeded with a native seed mix approved by CRGNSA botanist Robin Dobson.**

G. Recreation Resources

1. To the greatest extent practicable, emergency/ disaster response actions shall not adversely affect recreation resources.

Findings: The activities occurred in recreation intensity class 1. The emergency action did not have any adverse affect do recreation resources. The Pacific Crest National Scenic Trail crosses the BPA right of way in this area, however the trail was not modified or impeded.

H. Conclusion

The emergency tower replacement and road improvements 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.