

**ENVIRONMENTAL ASSESSMENT AND
FINDING OF NO SIGNIFICANT IMPACT**

Project Title: Mosier Ridge Cellular Communications Facility

EA Number: DOI-BLM-OR-S040-2012-0001-EA

Type of Project: Cellular communications facility construction and operation

Date: July 6, 2012

Location of Proposed Action: T. 3 S., R. 3 E. section 29 Tract 6, W.M.; Clackamas County, Oregon

Name and Location of Preparing Office: USDI - Bureau of Land Management, Salem District, Cascades Resource Area, 1717 Fabry Road SE Salem, OR 97306

Lease, Serial, or Case File Number: OR067058

Applicant Name: AT&T Mobility

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As the Nation's principal conservation agency, the Department of Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering economic use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interest of all people. The Department also has a major responsibility for American Indian reservation communities and for people who live in Island Territories under U.S. administration.

BLM/OR/WA/AE-12/012+1792

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The appendices are filed at the Salem District Office and are available on request.

ENVIRONMENTAL ASSESSMENT

1.0 INTRODUCTION

1.1 Purpose of and Need for Action and Decision to be Made

1.1.1 Purpose of and Need for Action

Currently, cellular service is limited within the project area by the lack of a local communications facility. The purpose of this action is to provide improved communications services to the residents of the project area, while minimizing potential impacts to the surrounding environment.

1.1.2 Decisions to be Made

The following decisions will be made through this analysis:

- 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 RMP/FEIS through a new EIS.

1.1.3 Summary of Proposed Action and Project Location

The Proposed Action is for the BLM to issue a Communication Use Lease that would authorize construction of a communications facility to support AT&T equipment on South Mosier Road, Oregon City, Oregon 97045. This includes the installation of a 150 foot monopole tower, an equipment shelter, and a short access road. This project is located in T. 3 S., R. 3 E. section 29; W.M. Clackamas County, Oregon.

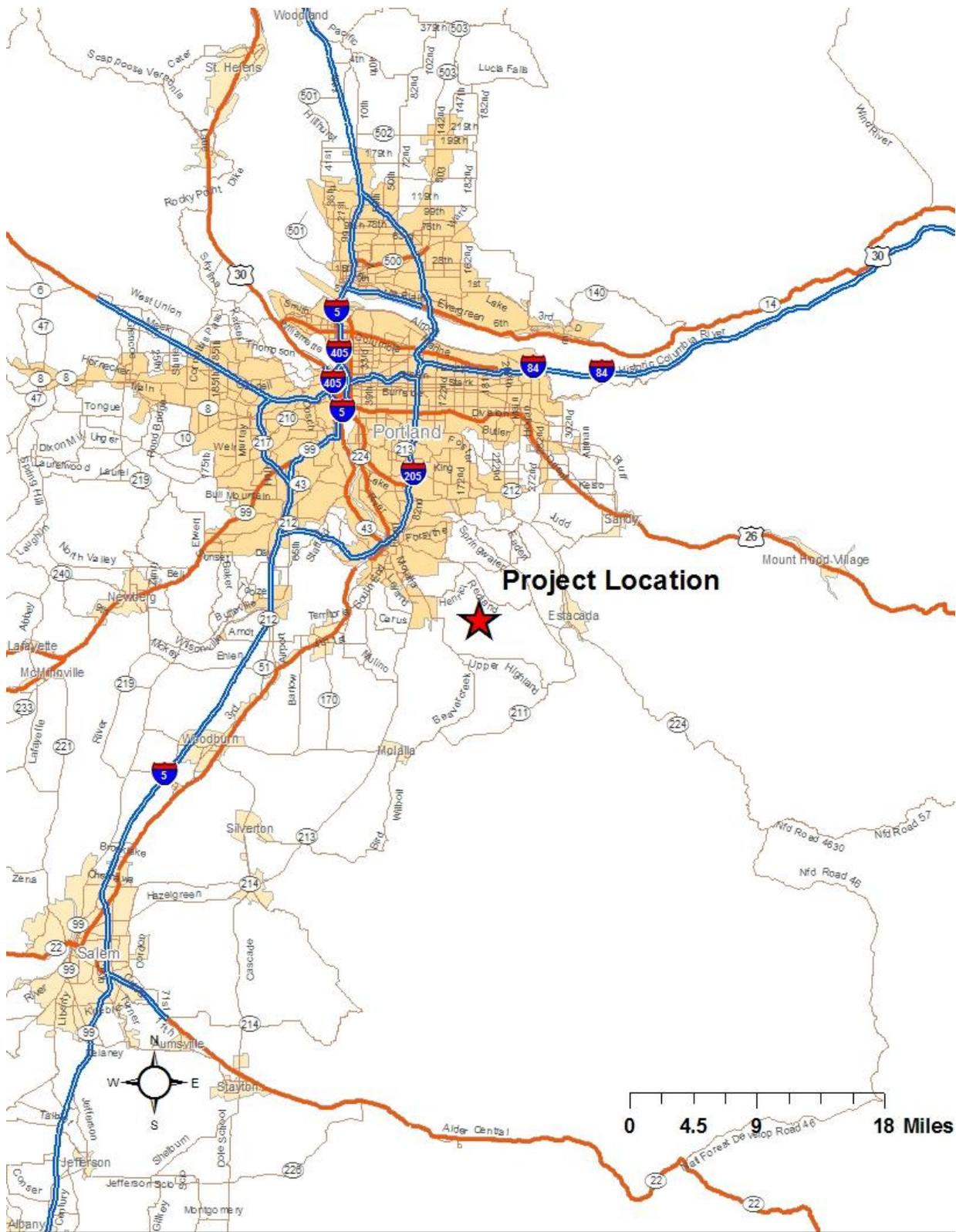


Figure 1. Overview of project location

1.2 Conformance with Land Use Plan, Statutes, Regulations, and other Plans

The proposed action is in conformance with the *Salem District Record of Decision and Resource Management Plan*, May 1995 (RMP) pp.56: topic: Consider new communication sites on a case-by case basis; *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*, April 1994 (the Northwest Forest Plan, or NWFP); and *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*, January 2001.

The proposed project is within the General Forest Management Area (GFMA) land use allocation (RMP p. 8).

The analysis in the Mosier Ridge Cellular Communications Facility EA is site-specific, and supplements and tiers to 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 Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines*, November 2000.

The above documents are available for review in the Salem District Office. Additional information about the proposed activities is available in the Mosier Ridge Cellular Communications Facility EA Analysis File, also available at the Salem District Office.

1.2.1 Survey and Manage Species Review

The Mosier Ridge Cellular Communications Facility project is in compliance with the survey and management standards and guidelines in the 2001 Survey and Manage Record of Decision (2001 ROD), as modified by July 6, 2011 Settlement Agreement (*Conservation Northwest, et al. v. Rey, et al.*, No. 08-1067, W.D. Wash., Coughenour, J. - IM-OR-2011-063, July 2011) because no habitat for Wildlife Survey and Manage would be modified due to the location and nature of the project. With regard to botanical species, surveys were conducted. Although suitable habitat to support some Botanical Survey and Manage species was identified at the proposed Cell Tower and Right-of-Way site, no Survey and Manage species were found.

1.2.2 Relevant Statutes/Authorities

This section is a summary of the relevant statutes/authorities that apply to this project.

- **Federal Land Policy and Management Act (FLPMA) 1976** – Defines BLM's organization and provides the basic policy guidance for BLM's management of public lands.

- National Environmental Policy Act (NEPA) 1969 – Requires the preparation of EAs or EISs on federal actions. These documents describe the environmental effects of these actions and determine whether the actions have a significant effect on the human environment.
- Endangered Species Act (ESA) 1973 – Directs Federal agencies to ensure their actions do not jeopardize threatened and endangered species.
- Clean Air Act (CAA) 1990 – Provides the principal framework for national, state, and local efforts to protect air quality.
- Archaeological Resources Protection Act (ARPA) 1979 – Protects archeological resources and sites on federally-administered lands. Imposes criminal and civil penalties for removing archaeological items from federal lands without a permit.
- Clean Water Act (CWA) 1987 – Establishes objectives to restore and maintain the chemical, physical, and biological integrity of the nation’s water.

Additional authorities and management direction are described in EA section 4.6.

All additional permits will be acquired as needed by the project proponent prior to implementation.

1.3 Scoping and Identification of Relevant Issues

1.3.1 Scoping

External scoping (seeking input from people outside of the BLM) for this project was conducted by means of a scoping letter sent out on November 17, 2010 to the following recipients: private landowners with ownership within one mile of the project site (fifty in total); Oregon state government agencies including Department of State Lands (DSL), Oregon Watershed Enhancement Board (OWEB), Oregon Department of Environmental Quality (ODEQ), Oregon Department of Fish & Wildlife (ODFW), Oregon Department of Forestry (ODF), Oregon Department of Transportation (ODOT), and Oregon Water Resources Department (OWRD); and interested tribal authorities including the Confederated Tribes of Siletz, the Confederated Tribes of the Grand Ronde, and the Confederated Tribes of the Warm Springs.

In addition, a public notice requesting comments on the project was run in the Oregonian on July 28, 2010. A total of nine responses were received from private landowners during the scoping period; one agency response was received from ODFW; and no responses were received from the Tribal Authorities contacted. EA section 1.3.2 summarizes the topics raised in the comments. Internal scoping was conducted by the Interdisciplinary Team (IDT) through record searches, field reviews and the project planning process. (Appendix E – Public Notice and Scoping)

1.3.2 Relevant Issues

Based on input from the public and the Interdisciplinary Team plus information contained in the RMP, the following issues were identified. These issues provide a basis for comparing the environmental effects of the proposed project and aid in the decision-making process.

The major issues brought forward were used to formulate alternatives, identify appropriate design features, or analyze environmental effects. The following major issues were identified:

1.3.2.1 Issue 1: Aviation Safety

Commenters expressed a concern about potential effects on aviation safety due to the construction of the proposed facility. This issue is addressed in the following sections of the EA: 3.2 & 4.2 – Public Safety.

1.3.2.2 Issue 2: Wildlife Impacts

Commenters expressed a concern about potential effects on sensitive wildlife species due to the construction of the proposed facility. This issue is further addressed in the following sections of the EA: 3.5 & 4.5 Fish and Wildlife.

1.3.2.3 Issue 1: Communication Quality

Commenters expressed positive feedback about the potential for improved communication service following the construction of the proposed facility. This issue is addressed in the following sections of the EA: 1.1.1 – Purpose & Need; and 3.2 & 4.2 – Public Safety.

Table 1. Initial Public Scoping Comments			
LOG#	DATE	COMMENT SUMMARY	RESPONSE
1	1/5/2011	The proposed tower may constitute a hazard to aviation.	See sections 2.2.1, 3.2 and 4.2 for a detailed discussion of this issue.
2	1/6/2011		
3	1/6/2011		
4	1/4/2011		
5	12/26/2010		
6	1/4/2011		
7	1/6/2011		

Table 1. Initial Public Scoping Comments			
LOG#	DATE	COMMENT SUMMARY	RESPONSE
8	1/7/2011	The proposed tower would be a benefit to the community due to improved communications service.	See section 1.2 for a discussion of the purpose of and need for action. Figures 6 and 7 in section 4.2 show cellular coverage before and project implementation.
9	1/28/2011	A peregrine falcon has been seen in the project vicinity.	See sections 3.5 and 4.5 for a discussion of wildlife issues.
10	12/30/2010	Migratory bird and terrestrial wildlife species impacts should be considered and minimized.	See sections 3.5 and 4.5 for a discussion of wildlife issues.

Table 2. Follow-up Public Scoping Comments			
LOG#	DATE	COMMENT SUMMARY	RESPONSE
11	8/30/2011	The concerns expressed by the owner of the adjacent airstrip have been adequately addressed and he no longer considers the proposed tower to be a hazard to aviation safety.	See sections 3.2 and 4.2 for a detailed discussion of this issue.

2.0 ALTERNATIVES

2.1 Alternative Development

Pursuant to Section 102 (2) (E) of the National Environmental Policy Act (NEPA) of 1969, as amended, 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." There were no unresolved conflicts concerning alternative uses of available resources, therefore, this EA will analyze the effects of the current "proposed action" and "No Action" alternative (which provides the baseline to evaluate effects).

2.2 Proposed Action

The proposed action includes the construction of a communications facility to support AT&T facilities at the following coordinates: 45.287369 N, 122.464825 W (NAD83). The host property is located near Oregon City, on South Mosier Road in Township 3 South, Range 3 East, Section 29, Tract 6 W.M., Clackamas County, Oregon. The property is managed by the Bureau of Land Management. Construction is expected to occur in spring and/or summer of 2012. Detailed construction drawings are included in Appendix A. The total area of disturbance is approximately one quarter of an acre.

The proposed lease area is forested land located near a private residential property. The proposed lease area would occupy a 50' x 50' area located approximately 300 feet from the adjacent privately owned driveway. The area surrounding the proposed lease area is developed with a mix of residential properties, agricultural-use land, and forested BLM managed land. Topographically, the proposed lease area slopes down to the south and is 798.5 feet above mean sea level. A recent (2011) aerial photograph of the project location is depicted in Figure 2.

A 150 foot monopole tower would be constructed within the lease area. Two spaces within the lease area would be reserved for future carriers. Three panels would be mounted near the top of the tower with 4 antennas mounted to each (a total of 12). Future collocation on the tower itself is expected to be likely and is considered within the context of this analysis. The tower and attached equipment would be painted matte green to blend with the natural surroundings.

An 11'6" x 26'0" prefabricated equipment shelter would be placed within the lease area alongside the tower, and would also be painted to match the surrounding area (green or black). A 6" concrete slab-on-grade would be constructed to serve as a foundation for the shelter per manufacturer's instructions. A diesel generator would be installed in the equipment shelter to provide backup power along with built in fuel tank. Two 5' by 5' concrete stoops would be constructed outside and adjacent to the equipment shelters. A 6' chain link fence topped with barbed wire would enclose the lease area. A 12' double swing gate would provide access on the SW side of the lease area. The site would be filled with 6" of ¾" diameter crushed rock above a weed barrier.

A 10' wide utility Right-of-Way Grant would be established as part of this project. Directional drilling would be used to connect from the NE of the lease area to a pad mounted power transformer located on an adjacent parcel. An existing power transformer would be replaced as part of this project. Power would be then routed to the site via this trench. Telco would run in this trench parallel to the underground power past the transformer to an existing pole for a total length of ~560'.

A 12' by ~200' gravel road would be constructed to provide access to the site from an existing asphalt road located at the NW corner of the property. The entire length of the access road which will be constructed is on BLM managed land.

A geotechnical engineering investigation would be conducted prior to tower construction. This would require the use a rubber track drill rig to advance one to two borings near the proposed tower center. The boring would be 8" in diameter and may extend up to 35'. The soil cuttings from the boring(s) typically fill less than one cubic yard and are spread about the area. The boring(s) would be filled with bentonite and water to seal the hole.

Long term maintenance of the surrounding vegetation may be required if it begins to obstruct the effective transmission of radiofrequency required for proper operation of this tower. In this case, limited branch trimming or tree topping would be conducted. All long-term vegetation maintenance would be coordinated with BLM resource specialists prior to implementation to ensure that no sensitive resources are adversely affected. Where possible, design consideration would focus on improving wildlife habitat.

Certified weed free straw and hay would be applied to disturbed soils following construction to encourage rapid re-vegetation and limit soil disturbance. All construction equipment would have its wheels and tracks cleaned prior to visiting the site to remove noxious weeds.

An electrical grounding system would be installed within the confines of the proposed lease area. The areas used for this grounding system would already have been disturbed during construction of the lease area.

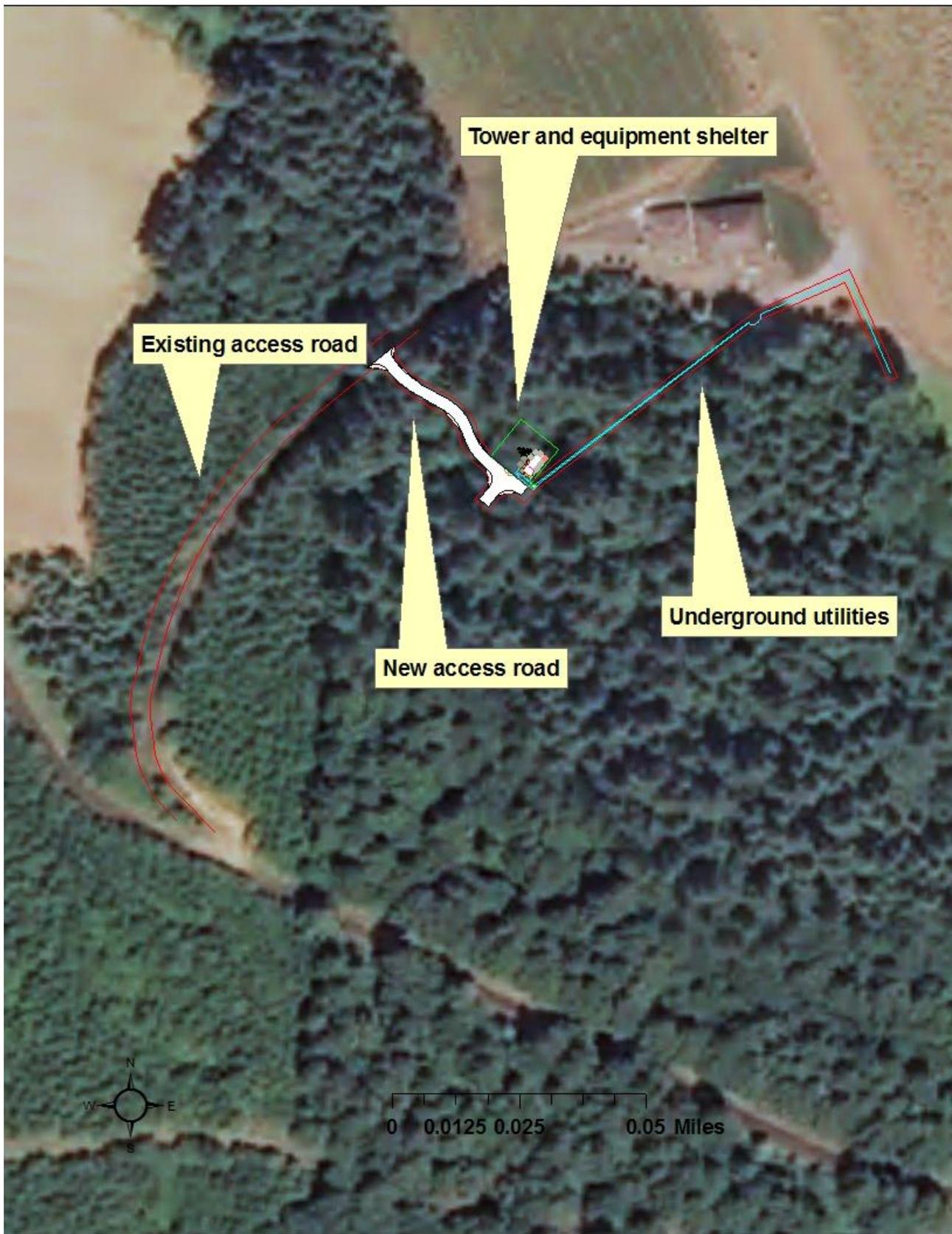


Figure 2. Project overview with 2011 aerial photograph

2.2.1 Project Design Features

- **Height & Type:** The tower would be a 150 foot monopole tower.
- **Lighting:** The proposed project includes a 150-foot monopole tower. According to the FAA's Advisory Circular (AC 70/7460-1K) *Obstruction Marking and Lighting*, the FAA does not typically require lighting for communication structures below 200 feet in height or high intensity white lights for communication structures below 500 feet in height.
- **Color:** The tower would be painted a matte green to help blend with the existing forest backdrop.
- **Transmission Components:** 3 antenna panels with 4 antennas each would be affixed to the top of the tower, facing roughly north, south-east, and south-west.
- **Timber:** The United States (managed by the BLM) retains ownership on all timber cut within the lease area. Any commercially viable timber cut during project implementation would be retained for sale or would be left on the ground as coarse woody debris (CWD) at the discretion of BLM resource specialists.

2.3 No Action Alternative

The No Action alternative describes the baseline against which the effects of the proposed action can be compared, i.e. the existing conditions in the project area and the continuing trends in those conditions if the BLM does not implement the proposed project. Consideration of this alternative also answers the question: "What would it mean for the objectives to not be achieved?" The "No Action alternative" means that no lease would be issued and that no construction related to the project or connected actions would occur.

2.4 Alternatives Considered But Eliminated from Detailed Analysis

To ensure reliable analog or digital cellular communications in a given region certain parameters including topographic or building obstructions, terrain elevations, distance of signal relay antennas, and zoning requirements must be considered in order to define an appropriate site selection search ring. Final candidate sites are then selected in this search area based upon accessibility, construction feasibility, available leasing opportunities, signal coverage, and minimizing environmental issues. Two candidates were identified that for further evaluation. Candidate One is described in detail above as the Proposed Action. Upon further evaluation of Candidate Two (45.288361, -122.465111 NAD 83), it was determined that it could not provide the level of service required due to its lower elevation (roughly 50 feet lower). The topography of the project vicinity is such that the number of viable alternatives was highly limited given the requirements of the desired service area.

3.0 AFFECTED ENVIRONMENT

This section of the EA describes the current condition and trend of the affected resources. The resources potentially affected by the proposed project are:

- **Visual Resources**
- **Public Safety**
- **Soils**
- **Vegetation**
- **Fish & Wildlife**

3.1 Visual Resources

The proposed project is located on an isolated parcel of BLM managed land within a mixed agricultural and rural residential community, and is located adjacent to a local access road. This road is primarily used by local residents and landowners (including private timber operators) and is not a major thoroughfare for commuters or sightseers. As such, there is limited opportunity for the general public (aside from the local landowners) to view the subject property itself.

The Visual Resource Management (VRM) designation of this area is VRM class 4 based on current project acreage information and ArcGIS data layers for VRM on the Salem District. On VRM 4 lands, the level of change to the characteristic landscape can be high. Activities may dominate the view and may be the focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance and repeating the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

The subject property is located on a small hill, and is well vegetated with relatively large trees (the oldest being ~ 90 years of age, and ~150 feet in height and located well away from the lease area itself where the tallest surrounding trees are ~130 feet in height). Much of the surrounding area has either been recently logged or has been converted for other uses (e.g. Christmas tree farming). As such, the subject property is easily distinguished visually by the presence of relatively mature conifers and other vegetation.

3.2 Public Safety

The project area currently has limited to no cellular service available via AT&T. Local residents noted during project specific conversations that cellular service in the area is currently very poor and that improvements in cellular communication would be welcomed. A map depicting coverage before and after is included in EA section 4.2 (Figures 6 and 7).

A small, privately owned airport (Skyhill Airport) is located adjacent to the project area. The airstrip itself consists of a cleared strip of grass with minimal improvements. Discussions with the owner of the airstrip and nearby property owners indicate that it is not used regularly. Although exact numbers are not available, it is estimated that the airstrip has only been used a handful of times in the past decade. The current owner is not a pilot, and no planes are based on the property. Furthermore, none of the adjacent landowners utilize the airstrip. Therefore although still functional, the airstrip is essentially non-operational.

The current configuration of the runway is east to west, with the runway terminus roughly 500 feet from the border of BLM managed property and roughly 900 feet from the proposed tower location. The current configuration of the airstrip requires pilots to climb and descend steeply when taking off or approaching from the west. An analysis of potential safety issues conducted by the Oregon Department of Aviation (ODA) for this project indicated that based on the topography of the area, the existing trees represent a hazard to navigation as they pierce the horizontal approach plane. Additionally, residential structures are located near both ends of the runway, representing a potential safety hazard related to the current layout of this facility.

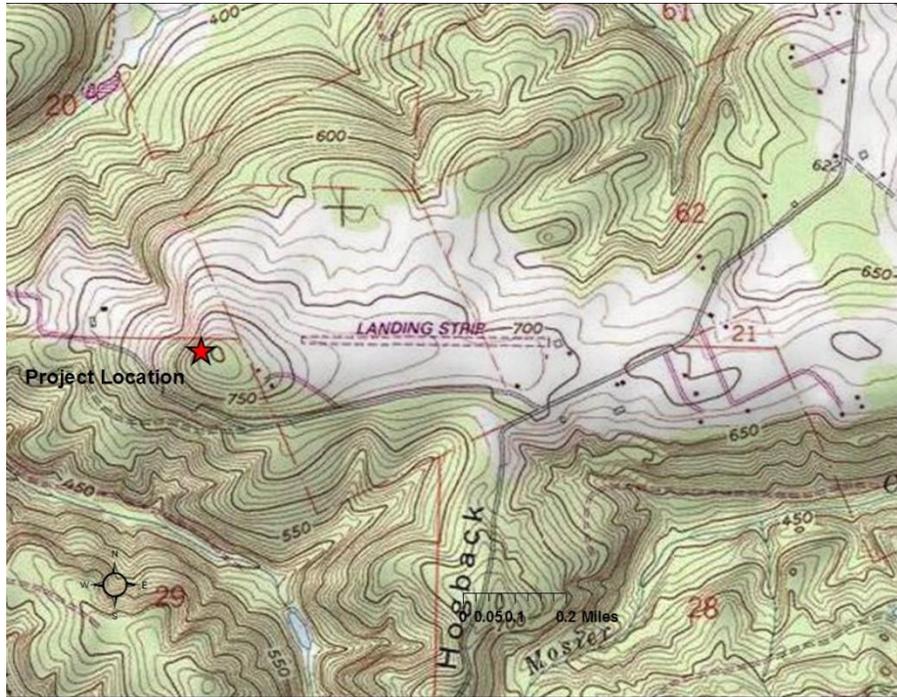


Figure 3 . USGS quad of the project area. Note the landing strip to the east of the proposed tower.

3.3 Soils

According to the Soil Survey of Clackamas County Area, Oregon (November 1985), the proposed lease area is underlain by Jory Silty Clay Loam (45b-e). Jory Silty Clay Loam is described as deep well drained soil on rolling uplands. The risks of water erosion with these soils are slight due to the slow runoff and moderately slow permeability. The tower itself would be located on Jory Silty Clay Loam 45b, which has slopes of 2-8 percent. The lease area itself is relatively flat. Refer to figure 4 for a depiction of the soils in the project vicinity.

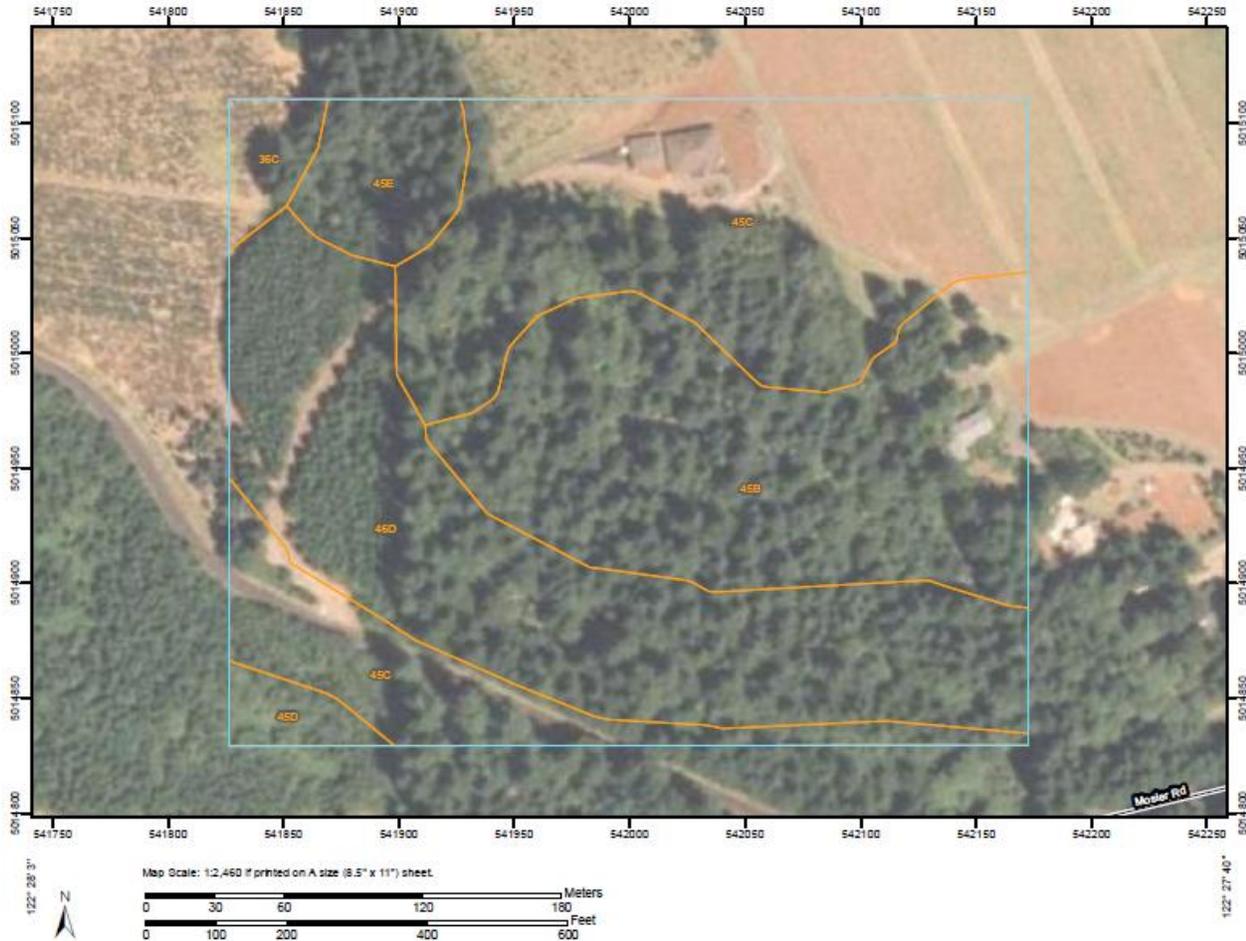


Figure 4: Soils at and adjacent to the project site

Table 3. Project Area Soils		
Map Unit Symbol	Map Unit Name	Slopes
36C	Hardscrabble silt loam	7 to 20 percent slopes
45B	Jory Silty clay loam	2 to 8 percent slopes
45C		8 to 15 percent slopes
45D		15 to 30 percent slopes
45E		30 to 60 percent slopes
46D		15 to 30 percent slopes

3.4 Vegetation

The proposed lease area is forested land located near private rural residential and zoned timber properties (primarily Christmas tree farms), and is well vegetated with a dense canopy and mid-story including Douglas Fir, Red Alder, Big Leaf Maple, *Vaccinium* spp, Sword Fern, Trailing Blackberry, Beaked Hazelnut and Holly.

Trees surrounding the lease area and right of way (ROW) fall into two primary age classes: ~33 years old and ~ 90 years old. The larger trees in this area are roughly 130 feet tall.



Figure 5. Vegetation surrounding the proposed tower location

A search of the BLM's known site database indicated here are no known sites for any T&E, SSS, S&M or ODA list A or T species located within or near the proposed Cell Tower or ROW site.

A field survey conducted in early spring of 2011 by a BLM staff botanist indicated the following:

- **Threatened and Endangered (T&E) Species:** There is no suitable habitat to support any T&E species within or adjacent to the proposed Cell Tower or ROW site. Additionally, no evidence of T&E was observed in the project area in May or August of 2011 during a site visit conducted by Adapt Engineering.
- **Special Status Species (SSS) and Habitat:** Although suitable habitat to support some SSS was present, that habitat was marginal and no SSS were found.

- **Survey and Manage (S&M) Species and Habitat:** Two age classes of overstory trees are present at the proposed Cell Tower and R-of-W site (33 and 90 year old). Surveys for S&M vascular plants, lichens and bryophytes are required in stands over 80 years of age and these surveys were conducted. Although suitable habitat to support some S&M species was identified at the proposed Cell Tower and ROW site no S&M species were found. There are no known sites for any S&M fungi within or near the proposed project area
- **Oregon Department of Agriculture (ODA) list A and T Species:** No ODA list A or T species were identified at or near the proposed Cell Tower or ROW site or along any road in the vicinity. Additionally, no evidence of invasive species was observed in the project area during site visits conducted by Adapt Engineering in May and August of 2011.

3.5 Fish & Wildlife

Fish: As there is no aquatic habitat within the project, no aquatic species are present within the project area and none were analyzed in detail for this assessment.

Wildlife: Special status wildlife species known or suspected to occur within the Cascade Resource Area of the BLM are described along with potential impacts in Section 4.5 of this document.

4.0 ENVIRONMENTAL EFFECTS

This section of the EA describes the environmental effects of the alternatives on those resources listed below. The interdisciplinary team of resource specialists (IDT) reviewed the elements of the human environment, required by law, regulation, Executive Order and policy, to determine if they would be affected by the proposed action (BLM Handbook H-1790-1: p. 137), [40 CFR 1508.27(b)(3)], [40 CFR 1508.27(b)(8)] (EA section 3), as well as the issues raised in scoping (EA section 1.3.2).

- **Visual Resources**
- **Public Safety**
- **Soils**
- **Vegetation**
- **Fish & Wildlife**

4.1 Visual Resources

4.1.1 Proposed Action

Under the proposed action, the monopole tower would extend roughly 20 to 30 feet above the tallest nearby trees. The tower would be painted a matte green to most closely blend with its surroundings and would not be distinguishable by color alone.

Photo-simulations were developed during the development of this document in the context of an analysis of potential impacts to historic properties required for compliance with the National Historic Preservation Act (NHPA). The information and figures described below can be found in Appendix C of this document. A primary finding of this assessment was that the proposed project would primarily be visible from the east along the open strip currently occupied by Skyhill Airport and Farms (see page 5 of attachment 12 within Appendix C for a graphic of the visible APE and the locations of the photo-simulation described below). Visibility from the South, North, and West is substantially limited by existing trees and topography to less than 1500 feet. Pages 3-6 of attachment 11a and page 1 of attachment 11b in Appendix C contain the photo-simulations developed for this project. Please note that although the photo-simulations contained in this document show the tower as grey, the current project plan calls for the tower to be painted a matte green to limit its visibility to the greatest extent possible.

The results of the photo-simulation effort are described below:

- **Simulation One:** This simulation was conducted at the proposed lease area. Although visible, the tower fits into the existing visual landscape and does not substantially impact the visual characteristics of the area.
- **Simulation Two:** This simulation was developed from the north looking towards the proposed tower directly through the trees. The tower is not visible from this angle, although it is anticipated that it would be visible above the treeline from this location.

- **Simulation Three:** This simulation was developed from the south west looking towards the proposed tower directly through the trees. The tower is not visible from this angle, although it is possible that it would be visible above the treeline from this location. This location is near the edge of the range of visibility.
- **Simulation Four:** This simulation was developed from the west looking towards the proposed tower from Mosier Road. Although, the tower is clearly visible from this angle, it is visually congruent with the existing large trees that dominate the viewscape. This location is near the edge of the range of visibility.
- **Simulation Five:** This simulation was developed from the south looking towards the proposed tower along Mosier Road. The tower is not visible from this angle. This location is near the edge of the range of visibility.
- **Simulation Six:** This simulation was developed from the east looking towards the proposed tower along Mosier Road. The tower is not distinguishable from this angle and location. This is the within the primary corridor of visibility described above.
- **Simulation Seven:** This simulation was developed from the east looking towards the proposed tower along Mosier Road roughly 0.5 mile away. The tower is barely distinguishable from this angle and location. This is the within the primary corridor of visibility described above. The limited visibility from this location suggests that visual effects are essentially negligible.

Overall, the results of this analysis suggest that although the top of the proposed tower would be visible from certain angles and locations, it would not substantially affect the visual characteristics or quality of the project area. In summary, no substantive effects to visual resources are expected from the proposed action.

4.1.2 Cumulative Effects

There are no known actions which are expected to be concurrent with the project and overlap the project location. Therefore no cumulative effects are anticipated.

4.1.3 No Action Alternative

Under the no action alternative, no construction would take place and no new ground disturbance would occur. Therefore no new impacts to visual resources would take place.

4.2 Public Safety

4.2.1 Proposed Action

Following implementation of the proposed action, cellular communication is expected to improve substantially in the project area. This allows for greater access to emergency services such as police, fire, and medical. As a result, the proposed project is expected to have a positive effect on public safety. Figures 6 and 7 below depict the expected coverage before and after the proposed project would be completed.

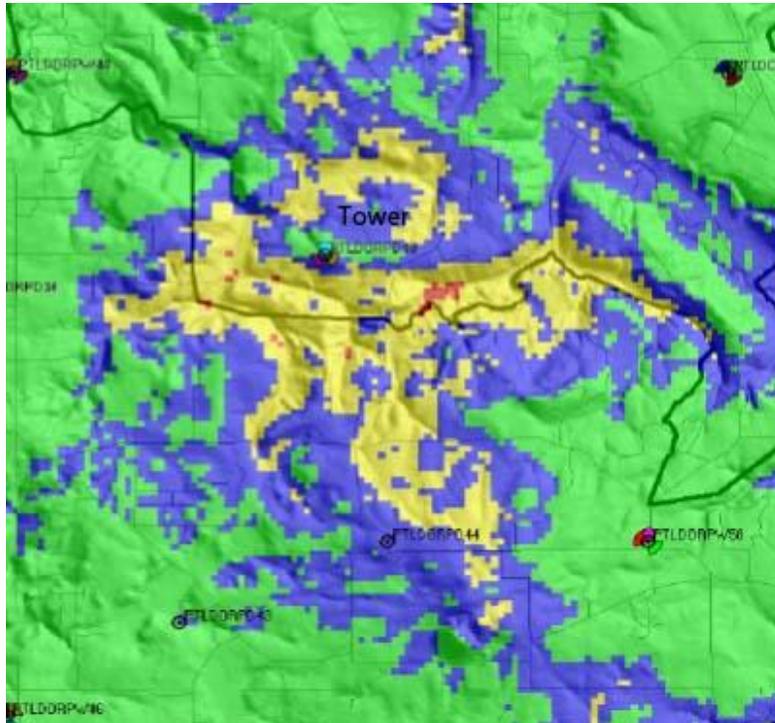


Figure 6. Cellular coverage prior to project implementation. Green = good signal; blue = moderate signal; yellow = poor signal; red = very poor signal

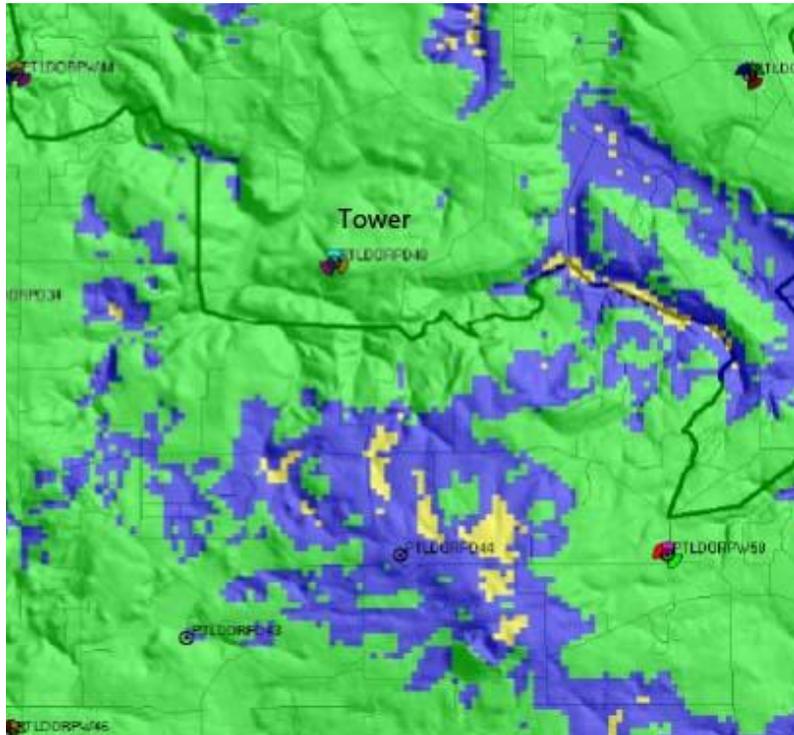


Figure 7. Coverage following project implementation. Green = good signal; blue = moderate signal; yellow = poor signal; red = very poor signal

Under the proposed action, the new tower would extend 20-30 feet above the existing tree-line. Aeronautical safety studies were requested from both Oregon Department of Aviation (ODA) and the Federal Aviation Administration (FAA) in August of 2010. The ODA study concluded that the proposed tower constituted a possible hazard to the Skyhill Airport. This determination was based upon the final height of the tower relative to ODA guidelines for the visual approach plane, which extends from the end of the runway at a 5% slope for 2500 feet.

However, the implementation of the proposed action is not expected to result in any effects on aviation safety for the following reasons.

1. The airstrip is essentially unused, with no regular traffic or usage and no planes stationed on the property or nearby. See EA section 3.2.
2. The aviation safety assessment conducted during the preparation of this document evaluated the safety of the proposed tower and the current configuration of Skyhill Airport (see Appendix D). This study is incorporated here by reference and states:

“This airstrip consists of a small grass field that has not been designed to be consistent with the requirements that the FAA mandates for this type of General Aviation airport (see [aviation report] figures 1-8). The current runway is oriented 090- 270 (East West). Runways are designated by the direction that they are heading with the last digit deleted. A runway that was facing 90 degrees i.e. East would be designated RW 09.

There is 2000ft of runway with a 400ft overrun on both ends (see [aviation report] figure 12). An uncontrolled road passes perpendicular to the runway approximately in the middle of the runway (see figure 6[of aviation report])). There are no navigation aids or markings of any kind. The prevailing wind is from the West. This would make RW 27 the preferred runway 90% of the time.

On the west end of the runway there is a house directly in line with RW 27 that the owner's mother lives in (see [aviation report] figure 1). There are ~150ft trees at the end of the overrun located on the adjacent hill. In the middle of the trees is where the proposed cell tower is to be located. We walked to the markers for the cell tower to ensure we knew exactly where it was to be located. All of the ~150 ft trees are on BLM land.

Because of the trees and house located on the end of Runway 09, Runway 27 is not safe for take-offs and only marginally safe for landings because of the missed approach considerations. If an aircraft were about to touch down and a vehicle crossed the road that runs across it a missed approach would require a very steep rate of climb and a hard right turn to miss the trees. This is not a safe runway to use. If runway 09 were to be used for takeoffs there would be a significant tail wind most of the time. Overcoming a 15 knot tailwind would increase the takeoff distance and make clearing of the barn and trees at the end of this runway marginally unsafe (see [aviation report] figures 3 & 4). According to the owner the prevailing winds are from the West from 5 to 20 knots.

This airfield has absolutely no navigation aids or visual markings for IFR (Instrument Flight Rules) flights. As noted it is not advisable to use this during any weather conditions. A skilled pilot could use this airstrip in an emergency.”

This analysis concluded that locating a cell tower in the proposed location would not affect airfield safety because the airstrip should not be used until the current unsafe conditions are corrected. The study recommended take-offs and landings from a different direction, which would not pass over the proposed location of the tower. Following the completion of this assessment, the owner of the airstrip (T. Braun) provided a follow-up letter indicating that his concerns had been addressed and he believed that the proposed project would not create an additional hazard to aviation safety and that it was compatible with his current and planned use of the airstrip.

4.2.2 Cumulative Effects

There are no known actions which are expected to be concurrent with the project and overlap the project location. Therefore no cumulative effects are anticipated.

4.2.3 No Action Alternative

Under the no action alternative, no construction would take place. The existing tree canopy would continue to constitute a hazard to air navigation based on the current configuration of Skyhill Airport. Cellular service would not improve, and access to emergency services would not improve. Therefore there would be no positive or negative impacts to public safety under this alternative.

4.3 Soils

4.3.1 Proposed Action

Given the forested vegetation and relatively moderate slopes the hazard of erosion is low. However, the use of BMPs to prevent erosion (i.e. straw bales, weed free grass seed, plastic sheeting during construction to cover stockpiles, and re-grading of the site to allow stormwater to infiltrate naturally) would further reduce the erosion probability. Additionally, given the final site configuration exposed soil along the access road and lease area would be covered with new concrete foundations and/or crushed rock surfacing. The drilling for utilities would have only a minor local impact at the entry and exit points. Weed free native grass seed would be applied to disturbed soils and weed free straw would be applied to control soil erosion and promote grass germination. Therefore surface erosion is expected to be minimal as a result of construction. Once construction is completed no new ground disturbance would be necessary, and consequently no long-term impacts to soils would occur.

A small portion of the lease area surrounding the proposed tower would be covered with a new 6" concrete pad (~11'x25') and two ~ 5'x5' concrete stoops, resulting in a very small increase in impervious surfaces. Given the small area of impervious surfaces added relative to the size of the subject property, changes in infiltration are expected to be minimal. In summary, no substantive effects to soils are expected from the proposed action.

4.3.2 Cumulative Effects

There are no known actions which are expected to be concurrent with the project and overlap the project location. Therefore no cumulative effects are anticipated.

4.3.3 No Action Alternative

Under the no action alternative, no construction would take place and no new ground disturbance would occur. Therefore no new impacts to soils would occur.

4.4 Vegetation

4.4.1 Proposed Action

As there are no T&E, SSS, or S&M plant or fungal species present (see section 3.5), there are no expected effects to these species classes from the proposed action. Long term maintenance would be minimal and would be coordinated with BLM resource specialists to ensure that significant resources are not adversely affected. Invasive weed introduction would be prevented using the design considerations described in section 2.2 of this document. The use of "Native" certified weed free straw and seed would speed re-vegetation of the disturbed area.

Any commercially viable timber cut during project implementation would be retained either for sale to be left on the ground as coarse woody debris (CWD) at the discretion of BLM resource specialists. Although this project would remove up to 1/3 of an acre of land from potential timber production, this acreage is very small in the context of the resource area and the impact would be minimal. Therefore, no substantive effects to vegetation are expected from the proposed action.

4.4.2 Cumulative Effects

There are no actions which are expected to be concurrent with the project and overlap the project location. Therefore no cumulative effects are anticipated.

4.4.3 No Action Alternative

Under the no action alternative, no construction take place and no new ground disturbance would occur. Therefore no new impacts to vegetation would occur.

4.5 Fish & Wildlife

4.5.1 Proposed Action

Fish: As there is no aquatic habitat within the project, no aquatic species are present within the project area and there would be no effect to these species from the proposed action.

Wildlife: Special Status species known or suspected to occur on BLM lands were reviewed and it was found that the project would have no effects on any BLM special status species. No habitat for Survey and Manage or BLM Sensitive Species would be modified due to the location and nature of the project. The project is outside the range of the red tree vole, and there are no Survey and Manage mollusk species suspected to occur in the vicinity. Furthermore, the project would have no effects to threatened or endangered terrestrial wildlife species, specifically the northern spotted owl.

There are no known spotted owl sites within the provincial home range of the project, and the project location is located in the Willamette Valley Physiographic Province in a rural residential area, which is considered to be outside the normal range of the spotted owl.

A discussion of each Special Status species known or suspected to occur in the Cascades Resource Area is included in Appendix H.

4.5.2 Cumulative Effects

There are no actions which are expected to be concurrent with the project and overlap the project location. Therefore no cumulative effects are anticipated.

4.5.3 No Action Alternative

Under the no action alternative, no construction take place and no new ground disturbance would occur. Therefore no new impacts to fish or wildlife would occur.

4.6 Review of Elements of the Environment Based On Authorities and Management Direction

Table 4. Elements of the Environment Review based on Authorities and Management Direction	
Element of the Environment /Authority	Remarks/Effects
Aquatic Conservation Strategy	This project complies with the Aquatic Conservation Strategy described in the Northwest Forest Plan and RMP. As there is no riparian habitat at or adjacent to the project site, there will be no effect to Riparian Reserves or other aquatic resources.
Air Quality (Clean Air Act as amended (42 USC 7401 et seq.))	This project is in compliance with this direction because only small quantity of emissions would result from the construction of the proposed tower. These emissions would be temporary however and would be expected to be within the normal range of emissions from farm equipment
Cultural Resources (National Historic Preservation Act, as amended (16 USC 470) [40 CFR 1508.27(b)(3)], [40 CFR 1508.27(b)(8)])	This project is in compliance with this direction and the project would have no effect on this element. An Archaeological assessment was conducted at by Walton Enterprises. It was determined that the entire parcel (including project area) was inventoried by BLM in 1997 and that no cultural resources were found. A follow-up field assessment was conducted by Walton Enterprises and no evidence of archaeological resources was found. Based on these assessments, the project would have no effect on any cultural resources. (see Appendix B) An above ground assessment of historic properties was conducted by Dave Pinyerd. This assessment concluded that no historic properties would be adversely affected by the proposed action. (see Appendix C) This information was provided to the Oregon State Historic Preservation Office for review and comment. Concurrence was received on November 14, 2011 that no archeological resources would be impacted and on January 3, 2012 that no above ground resources would be impacted. (see Appendix F)
Ecologically critical areas [40 CFR 1508.27(b)(3)]	This project would have no effect on this element because there are no ecologically critical areas present within the project area.
Energy Policy (Executive Order 13212)	This project is in compliance with this direction because this project would not interfere with the Energy Policy (Executive Order 13212).
Environmental Justice (E.O. 12898, "Environmental Justice" February 11, 1994)	This project is in compliance with this direction because project would have no negative effect on low income populations.

Table 4. Elements of the Environment Review based on Authorities and Management Direction	
Element of the Environment /Authority	Remarks/Effects
Fish Habitat, Essential (Magnuson-Stevens Act Provision: Essential Fish Habitat (EFH): Final Rule (50 CFR Part 600; 67 FR 2376, January 17, 2002)	This project is in compliance with this direction because there is no essential fish habitat at or near the project site.
Farm Lands, Prime [40 CFR 1508.27(b)(3)]	The project would have no effect on this element because no prime farm lands are present on BLM land within the Cascades RA.
Floodplains (E.O. 11988, as amended, Floodplain Management, 5/24/77)	This project is in compliance with this direction because the proposed project would not change or affect floodplain functions.
Hazardous or Solid Wastes (Resource Conservation and Recovery Act of 1976 (43 USC 6901 et seq.) Comprehensive Environmental Repose Compensation, and Liability Act of 1980, as amended (43 USC 9615)	This project would have no effect on this element because no Hazardous or Solid Waste would be stored or disposed of on BLM lands as a result of this project.
Healthy Forests Restoration Act (Healthy Forests Restoration Act of 2003 (P.L. 108-148)	This project is in compliance with this direction because: the proposed project would not result in a substantial change in vegetation.
Migratory Birds (Migratory Bird Act of 1918, as amended (16 USC 703 et seq)	This project is in compliance with this direction because the proposed tower would not be lit, would not have guy wires attached, and would be similar in height to the surrounding trees.
Native American Religious Concerns (American Indian Religious Freedom Act of 1978 (42 USC 1996)	This project is in compliance with this direction because no Native American religious concerns were identified during the scoping period (EA section 1.3).
Noxious weed or non-Invasive, Species (Federal Noxious Weed Control Act and Executive Order 13112)	This project is in compliance with this direction because no noxious weeds were found during project specific site visits (see section 4.2) and all equipment would be cleaned to remove potential contamination before and after traveling to the project site.
Park lands [40 CFR 1508.27(b)(3)]	The project would have no effect on this element because there are no parks within or adjacent to the project area.
Public Health and Safety [40 CFR 1508.27(b)(2)]	The project would have beneficial effects to safety by improving communication in the area. No adverse effects are expected for the reasons described in EA sections 3.2 and 4.2.

Table 4. Elements of the Environment Review based on Authorities and Management Direction	
Element of the Environment /Authority	Remarks/Effects
Threatened or Endangered Species (Endangered Species Act of 1983, as amended (16 USC 1531))	This project is in compliance with this direction because there would be no adverse effects on Threatened or Endangered Species based on the results of the analysis presented in sections 3.5 and 4.5.
Water Quality –Drinking, Ground (Safe Drinking Water Act, as amended (43 USC 300f et seq.) Clean Water Act of 1977 (33 USC 1251 et seq.)	This project is in compliance with this direction because Oregon State water quality standards would be adhered to and the area hydrology would not be changed due to minimal changes in impervious surface area, the lack of freshwater at or near the project site, and the application of grass seed and straw following project construction.
Wetlands (E.O. 11990 Protection of Wetlands 5/24/77) [40 CFR 1508.27(b)(3)]	This project is in compliance with this direction because no wetlands are within or adjacent to the project.
Wild and Scenic Rivers (Wild and Scenic Rivers Act, as amended (16 USC 1271) [40 CFR 1508.27(b)(3)]	This project is in compliance with this direction because there are no Wild and Scenic Rivers within or adjacent to the project area.
Wilderness (Federal Land Policy and Management Act of 1976 (43 USC 1701 et seq.); Wilderness Act of 1964 (16 USC 1131 et seq.)	This project is in compliance with this direction because there are no Wilderness Areas or areas being considered for Wilderness Area status in or adjacent to the project area.

4.6.1 Compliance with the Aquatic Conservation Strategy

The action is not within a riparian reserve and does not contain or affect any riparian habitat.

4.7 Review of Alternatives with Regard to Purpose of and Need for Project

The proposed action would meet the purpose and need for action by improving communications services to the residents of the project area, while minimizing potential impacts to the surrounding environment. Although the no action alternative would have no effect on the environment, it would not improve communication services in the project area.

5.0 LIST OF PREPARERS

Table 5. List of Preparers		
Resource	Name	Initial and Date
Writer/Editor	Lindsay Mico	LM 7/2/12
Editor/Scoping	Beth Belanger	BB 7/2/12
Editor	Benjamin White	BW 2/27/12
NEPA Review	Carolyn Sands	CDS 7/6/12
Botany	Terry Fennell	TGF 02/01/12
Cultural Resources	Heather Ulrich	HAU 03/27/12
Fisheries	Bruce Zoellick	BWZ 01/09/12
Soils	Patrick Hawe	WPH 01/03/12
Wildlife	James England	JSE 01/24/12
Visual Resources	Traci Meredith	TMM 06/20/12
Realty	Janet Myers	JRM 4/30/12

6.0 CONTACTS AND CONSULTATION

6.1 Consultation

6.1.1 US Fish and Wildlife Service (USFWS)

The results of this assessment (see sections 3.5 and 4.5) indicate that the proposed action would have no effect on threatened or endangered species managed by USFWS. Findings of “no effect” do not require consultation with USFWS under Section 7 of the Endangered Species Act.

6.1.2 National Marine Fisheries Service (NMFS)

The results of this assessment (see sections 3.5 and 4.5) indicate that the proposed action would have no effect on threatened or endangered species managed by NMFS. Findings of “no effect” do not require consultation with NMFS under Section 7 of the Endangered Species Act.

6.2 Cultural Resources: Section 106 Consultation with State Historical Preservation Office (SHPO)

An archaeological assessment was conducted by Walton Enterprises. It was determined that the entire parcel (including project area) was inventoried by BLM in 1997 and that no cultural resources were found. A follow-up field assessment was conducted by Walton Enterprises and no evidence of archaeological resources was found. Based on these assessments, the project would have no effect on any cultural resources. (see Appendix B) An above ground assessment of historic properties was conducted by Architectural Historian Dave Pinyerd. This assessment concluded that no historic properties would be adversely affected by the proposed action. (see Appendix C) This information was provided to the Oregon State Historic Preservation Office for review and comment. Concurrence was received on November 14, 2011 that no archeological resources would be impacted and on January 3, 2012 that no above ground resources would be impacted. (see Appendix F)

6.3 EA Public Comment Period

For the results of project scoping, see EA section 1.3.2. The EA and FONSI will be made available for public review from **July 25, 2012** to **August 10, 2012** and posted at the Salem District website at <http://www.blm.gov/or/districts/salem/plans/index.php>. The notice for public comment will be published in a legal notice in the ***Molalla Pioneer*** newspaper. Written comments should be addressed to Cindy Enstrom, Field Manager, Cascades Resource Area, 1717 Fabry Road S., Salem, Oregon 97306. Emailed comments may be sent to BLM_OR_SA_Mail@blm.gov Attention: Cindy Enstrom

7.0 FINDING OF NO SIGNIFICANT IMPACT

Based upon review of the Mosier Ridge Cellular Communications Facility EA and supporting documents, I have determined that the proposed action is not a major federal action and would not significantly affect the quality of the human environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity as defined in 40 CFR 1508.27. Therefore, supplemental or additional information to the analysis in the RMP/FEIS in the form of a new environmental impact statement is not needed. This finding is based on the following discussion:

Context [40 CFR 1508.27(a)]: Potential effects resulting from the implementation of the proposed action have been analyzed within the context of the project area boundaries, and the following 6th field watershed: Abernethy Creek. This project would affect approximately 0.03 percent of the 21,026 acres combined 6th field watersheds listed above.

Intensity refers to severity of impact [40 CFR 1508.27(b)]. The following text shows that the proposed project would not have significant impacts with regard to ten considerations for evaluating intensity, as described in 40 CFR 1508.27(b).

1. [40 CFR 1508.27(b) (1)] – *Impacts that may be both beneficial and adverse*: The effects to Visual Resources, Soils, Vegetation, Public Safety, and Fish & Wildlife are unlikely to have significant (beneficial and adverse) impacts (*EA section 4*) for the following reasons:
 - Project design features described in EA section 2.2.1 would reduce the risk of effects to affected resources to be within RMP standards and guidelines and to be within the effects described in the RMP/EIS.
 - *Affected Resource - Visual Resources (EA section 4.1)*: Effects to this resource are not significant because: the proposed structure would only be visible from a relatively small number of viewpoints; would only extend ~20 feet above the treeline; and would be painted matte green to blend with its surroundings.
 - *Affected Resource – Public Safety (EA section 4.2)*: Effects to this resource are not significant because: 1) the aviation assessment conducted for this study indicate that construction of the proposed tower would not increase safety risks associated with a nearby airstrip and 2) the proposed project would improve communication within the area and would therefore result in a very small net positive effect to safety.
 - *Affected Resource – Soils (EA section 4.3)*: Effects to this resource are not significant because: the extent of ground disturbance is insignificant relative to the subject property; no substantial increases in impervious surfaces would occur; and appropriate post construction procedures would be employed to ensure rapid re-vegetation of disturbed soils.
 - *Affected Resource – Vegetation (EA section 4.4)*: Effects to this resource are not significant because: no threatened, endangered, or sensitive species are present in the project area.
 - *Affected Resource – Fish & Wildlife (EA section 4.5)*: Effects to this resource are not significant because: a species specific assessment for all Bureau sensitive species indicated that there would be no substantial effects on any of these species.

2. *[40 CFR 1508.27(b) (2)] – The degree to which the proposed action affects public health or safety:* The proposed project would not adversely affect public health or safety because 1) the aviation assessment conducted for this study indicate that construction of the proposed tower would not increase safety risks associated with a nearby airstrip and 2) the proposed project would improve communication within the area and would therefore result in a very small net positive effect to safety. (EA sections 3.2 and 4.2).
3. *[40 CFR 1508.27(b) (3)] – Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:* The proposed project would not affect historical or cultural resources because no such resources are present in the project area. The proposed project would not affect parklands, prime farmlands, wild and scenic rivers, wilderness, or ecologically critical areas because these resources are not located within the project area (EA Section 4.6).
4. *[40 CFR 1508.27(b) (4)] – The degree to which the effects on the quality of the human environment are likely to be highly controversial:* The proposed project is not unique or unusual. The BLM has experience implementing similar actions in similar areas without highly controversial effects. All public comments have been addressed during the preparation of the Environmental Assessment.
5. *[40 CFR 1508.27(b) (5)] – The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks:* The effects associated as a result of the project do not have not uncertain, unique or unknown risks because the BLM has experience implementing similar actions in similar areas without these risks and project design features would minimize the risks associated with the project (EA section 2.3.4). See # 4, above.
6. *[40 CFR 1508.27(b) (6)] – The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:* The proposed action would not establish a precedent for future actions nor would it represent a decision in principle about a further consideration for the following reasons: 1) The project is in the scope of proposed activities document in the RMP EIS. and, 2) the BLM has experience implementing similar actions in similar areas without setting a precedent for future actions or representing a decision about a further consideration. See # 4, 5, above.
7. *[40 CFR 1508.27(b) (7)] - Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:* The Interdisciplinary Team (IDT) evaluated the project area in context of past, present and reasonably foreseeable actions and determined that there are no expected cumulative effects.

8. [40 CFR 1508.27(b) (8)] - *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:* The project would not affect these resources because an assessment of historic properties conducted for this project indicated that only one property potentially eligible for the NRHP was within the APE for visual effects and that this property would not be adversely affected by the project. Additionally, an archeological assessment indicated that no archeological resources were present in the project area. Consultation was carried out with Oregon SHPO resulting in concurrence with these findings. (EA section 6.2 and Appendix F)
9. [40 CFR 1508.27(b) (9)] - *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act (ESA) of 1973:* The proposed project is not expected to adversely affect ESA listed species or critical habitat for the following reasons:
- *ESA Wildlife - Northern spotted owl (EA Section 4.5):* There would be no effects to spotted owls due to the location of the project and lack of suitable habitat in the vicinity. ESA Consultation is described in EA section 6.1.1.
 - *ESA Fish – UWR Chinook salmon, UWR steelhead trout, LCR coho salmon, and LCR steelhead trout (EA Sections 4.5 and 6.1.2):* Effects to ESA fish are not significant because there is no freshwater habitat at or adjacent to the project area. ESA Consultation is described in EA section 6.1.1.
10. [40 CFR 1508.27(b) (10)] - *Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment:* The proposed project activities have been designed to follow Federal, State, and local laws (EA sections 1.2, 2.2, 4.6).

Approved by: Cindy Enstrom _____ Date: 07/06/2012

Cindy Enstrom, Cascades Resource Area Field Manager