

Appendix A

WRIGHTS POINT COMMUNICATION SITE
MANAGEMENT PLAN

THREE RIVERS RESOURCE AREA
BURNS DISTRICT OFFICE
HINES, OREGON

December 2002

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Wrights Point Communication Site Management Plan

I. Introduction:

The Wrights Point Communication Site Management Plan calls for the management and development of a new communication site and facilities, a process to accommodate multiple tenants/customers, provide access for all site users, and guidelines for the construction of facilities that have minimum impact to the immediate site and surrounding resources. It should be noted that this communication site management plan is only an activity plan for the Wrights Point Communication Site and broad allocation planning for the area is found in the Bureau of Land Management (BLM), Three Rivers Resource Management Plan (RMP). The Wrights Point Communication Site is approximately 4,350 feet in elevation and located at W.M., T. 24 S., R.30 E., Section 33, NE¼SE¼. Wrights Point is located approximately 20 miles from Hines, Oregon, in Harney County on public land, administered by the BLM with private land bordering the site.

II. Existing Situation:

The BLM, Burns District, Three Rivers Resource Area, is implementing a communication site management plan concurrent with the approval of a new BLM repeater site located at Wrights Point. This site serves a population of less than 25,000. The new facilities can be seen from Highway 205 and have a Visual Resource Management (VRM) Class III rating. The Class III rating requirements are partial retention of the landscape character. Vegetation at the communication site is primarily a crested wheatgrass seeding with some encroaching big sagebrush. There are many surface stones and rock outcroppings. The land on top of Wrights Point is relatively flat where the new repeater site and any additional future communication facilities are to be built. Livestock, mule deer, antelope, coyotes, and other high desert animals can be found at or near the site.

Although the site currently will have only one user (BLM), the facilities will be built to house additional users in the future. The repeater site is being constructed to provide additional radio coverage for the Burns Interagency Fire Zone (BIFZ). The com-site will be designated only for low power uses such as radio, microwave, and low power FM since the area serviced is rural with low population densities and is surrounded by mountain ranges which reduces viability of the site for high power uses and demand. All additional users would be located in newly-constructed facilities. All right-of-way applications would receive the normal review to meet the standards of the National Environmental Policy Act (NEPA), but in most cases minimal documentation may be necessary.

III. Objectives:

The objectives of this plan are to document communication site management policy, development strategies, procedures, and standards; and to present a program for future growth, development, and operation. The plan will help fulfill the BLM's need for additional radio coverage for BIFZ, the public need for adequate communication sites, protect the interests of lessees and site users by preserving a safe and electronically "clean" environment, and encourage the efficient development and use of space and facilities within the designated site. All would be subject to the BLM goal to provide the best possible public service at reasonable cost. The management plan will also achieve visual quality objectives by requiring design standards that are unobtrusive and utilize earth-tone colors and nonreflective surface material. The plan includes a description of the BLM policy for authorizing road construction, use, and maintenance, and establishing the framework for a User's Association (see Section V) which could provide recommendations to the BLM Authorized Officer when there are two or more lessees. The team members contributing to this plan include:

1. Al Foulke, Telecommunication Specialist
2. Gary Foulkes, Planning and Environmental Coordinator
3. Terri Geisler, Geologist
4. Rudy Hefter, Supervisory Natural Resource Specialist
5. Holly LaChapelle, Team Leader, Land Law Examiner
6. Brian McCabe, Archaeologist
7. Fred McDonald, VRM, Natural Resource Specialist
8. Steve Morefield, Assistant Fire Management Officer
9. Skip Renschler, Recommending Official, Realty Specialist
10. Lesley Richman, Weed Specialist
11. Fred Taylor, Wildlife Biologist
12. Nora Taylor, Botanist/Ecologist/Rangeland Management Specialist
13. Michael Williams, Safety Officer

IV. Standards:

This communication plan will be incorporated into all new leases issued for this specific site and must be used in conjunction with the lease. Provisions of the plan are enforced through the lease. Each lessee is expected to include the requirements between the lessee and the lessee's tenants and customers and the lessee is also responsible for enforcing those provisions. Development and management of the site will be subject to the following requirements which are in addition to the specifications of the standard lease. In the event of a conflict, lease language governs. See Appendix A, Maps, for the designated site area.

- A. All utility lines will be buried in accordance with local, State, and Federal government covenants and codes, where feasible.

- B. Existing lessees will be given the opportunity to review and comment upon any proposals for new site leases. It is expected that lessees will involve their own tenants and customers as they see fit.
- C. Building and Antennae Support Structures:
1. All structures must meet the requirements governing designs of facilities as outlined in the most recent edition of applicable building codes. Where there is a conflict in code between Federal, State or local sources, the most stringent version will be used.
 2. All facilities authorized will be capable of accommodating multiple tenants/customers unless the requirement is waived by the BLM. The primary reason for a waiver would be a problem with technical compatibility. Whenever it is reasonable, as determined by the BLM, new site users will be required to locate in or on existing facilities. The BLM reserves the right to authorize additional leases at any appropriate time (site space permitting). The following examples are provided to demonstrate the circumstances under which the BLM might deviate from the general development principle of maximizing use of existing space before authorizing new leases:
 - a. To respond to verified instances of unfair business practices of the current lessee(s); and
 - b. To deal with technical problems which cannot reasonably be solved in an existing facility.

These two examples are not intended to be an all-inclusive list of what may prompt BLM consideration for issuing a new lease even though existing space is not fully utilized.

3. When reasonable, facilities should be planned and designed for future expansion, including additions to the building and additional antenna supports as may be required by the original owner or subsequent applicant.
4. Structures will be located, as much as possible, to take advantage of vegetative and topographic screening, while providing maximum service area for telecommunication purposes and minimizing interference. Applications must provide sufficient data so the visual compatibility of the proposed structures, landform or vegetation changes can be evaluated.

5. Buildings:
 - a. Building design will include provisions for separate and secure compartments for each individual tenant or customer.
 - b. Exterior surfaces will be painted with flat (nonglossy) paint or stain in an earth-tone color. The paint must be approved by the Authorized Officer prior to use.
 - c. All new buildings will generally be uniform in shape and roof style and approved by the BLM Authorized Officer. Maximum height allowed is 12 feet.
 - d. New buildings and structures will be built away from the rim edge with no outside lighting that would be visible all night; security and motion lighting will be permitted. Lessee should use topography or vegetation to help screen existing facilities.

6. Antenna Support Structures:
 - a. Antenna support structures will be built in accordance with industry standards and applicable laws, codes, and regulations; currently the American National Standards Institute (ANSI)/EIA/TIA-222. In addition, the structure will meet standards for wind and ice loading. Antenna supports will conform to the installation specifications of the tower manufacturer. Any variations from these standards will be allowed only to the extent required because of local terrain or obstructions at the site and must be approved by the BLM in advance. All variances will conform to good engineering practices.
 - b. Antenna support structures will be designed to accommodate the reasonably predictable needs to match the space available in the building. Where appropriate, microwave supports should be designed as a feature of the building.
 - c. Antenna support structures should be located so they visually blend in with other site features as much as reasonable.
 - d. All towers will be self-supporting. No guy wires are permitted.
 - e. Maximum tower height will be 50 feet. Towers may be lattice type steel or steel poles.

- f. All metallic structural materials will be galvanized, plated, coated or painted. Galvanized towers will be permitted and will not be required to be painted but may be treated to dull their finish. Dissimilar metals will not be placed in contact with each other in such a manner that could create a galvanic junction.
 - g. Physical deterioration that weakens the structure or causes electromagnetic interference will be corrected within a time limit recommended by the User's Association, if applicable, and specified by the BLM.
 - h. Anti-climb devices, removable steps, or other means to discourage unauthorized climbing of the towers is required.
- D. Fences not directly related to the security of telecommunication equipment or structure will not be permitted. Any security fencing material and location must be approved by the BLM Authorized Officer prior to installation. Metallic fences will be grounded, covered with a vinyl material, galvanized or painted to blend in with the environment. Fences will be built away from the rim edge and the lessee should use topography or vegetative to help screen the fence.
- E. With the exception of galvanized towers and structures, all facilities will be painted in an earth-tone color approved by the BLM unless exempted by the Authorized Officer.
- F. All new lessees will give the BLM a minimum of 30 working days' notice prior to commencing any communication operations.
- G. The lessee will, when requested, provide the BLM Authorized Officer a list of current phone numbers and addresses of all tenants and customers.
- H. All facilities will be identified on a map and on-the-ground with a combination of a BLM-assigned serial number and a lessee assigned sequential facility number unless the requirement is waived by the BLM.
- I. Any signs required by law, or as additionally stipulated by the BLM, will be provided and installed by the lessee in accordance with standards and instructions as specified by the BLM. Hazard warning devices will be used when and where needed.

- J. All facility owners will be responsible for maintaining a fire break around the outside perimeter of their lease. The purpose of the fire break is to protect facilities within the communication site. Evaluating the condition of the fire breaks will become part of any inspection by the lessee or BLM. Standards for the fire break are as follows:
1. All wooden structures, or any structure or facility which is covered by a flammable material or which contains flammable material, will have a zone around the structure cleared of all vegetation for a distance of 20 feet. For other facilities, a 20-foot zone will be created around the facility which is cleared of all vegetation except grass or forbs. Annually, from May 1 to September 30, this vegetation will be treated as needed to keep the height of all live and dead material within 6 inches of the ground.
 2. For a distance of 130 feet around the outside perimeter of the communication site, each lessee will treat their portion of that zone to reduce ladder fuels as specified by the BLM.
- K. Electric and Electronic Considerations:
1. Electric:
 - a. A common ground system will be used on all equipment installed as part of a single communication lease. This common grounding system will be developed and shared by all users within each separate communication system located at the site. All facilities within the particular communication system will be connected to this common grounding system. The common grounding system will meet current applicable codes and standards of ANSI/EIA/TIA-607-1994, be consistent with standard ANSI/EIA/TIA-568-1991, and be installed in accordance with standard ANSI/EIA/TIA-569-1990. Structures will be designed for maximum lightning protection through bonding and the grounding system. Lightning protection will be installed on the top of every structure.
 - b. All electric facilities, equipment, and their installation will conform to the current National Electrical Safety Code or local regulations, whichever might be more stringent, and to applicable laws and regulations.

c. Radio Frequency Transmission Lines:

- 1) All transmission lines will be 100 percent shielded. All new or replacement external transmission lines will be 100 percent shielded with a UV resistant covering. All external connectors will be installed as specified in the manufacturer's instructions and made watertight. All internal transmission lines will be double braided or solidly shielded and jacketed.
- 2) No transmission lines will be left unterminated. They must be terminated in their characteristic impedance.
- 3) All lines will be attached to a support structure between the tower and the building structure.

2. Electronic:

a. Transmitters:

- 1) The site will be developed for low power uses such as microwave, radio (including FM less than 500 watts), and two-way radio. The maximum power output is: for frequencies below 1 GHz, restrict power output to 50 watts and the Effective Radiated Power (ERP) to no more than 500 watts; for frequencies 1 GHz or above, restrict power to 10 watts. High power uses such as television broadcasting will not be allowed since the area serviced is rural with low population densities (less than 25,000) and surrounded by mountain ranges reducing viability of the site for high power uses and demand.
- 2) All transmitters will have protective devices such as circulatory, cavities, duplexes, etc., designed into or externally installed to prevent direct interference with other users.
- 3) All transmitters will be Federal Communication Commission (FCC) type accepted or meet type acceptance criteria.
- 4) The direct radiation of out-of-band emissions (i.e., noise, spurious harmonics) will be reduced to a minimal level such that they may not be identified as a source of interference.

- 5) All transmitters not in immediate use and not specifically designated as standby equipment will be removed.
 - 6) Combining transmitters should be implemented when technically feasible to minimize overall antenna mass and height.
- b. Receivers:
- All receivers will have sufficient "front end" preselection or installed cavities as needed to prevent receiver-produced inter-modulation or adjacent channel interference.
- c. Antennas:
- 1) All antennas not in immediate use will be terminated in their characteristic impedance (Z_0) to prevent reradiation of intercepted signals or noise.
 - 2) All broken or defective antennas will be repaired or removed from the site.
- d. Microwave dishes will be compatible with other uses at the site.
- e. Any new or existing user will not subject the current users of the site to a noise level greater than 10 db below the currently measured "noise floor" on all frequencies reasonably removed from the permittee's own frequency, thereby not causing any measurable degradation to existing receiver performance. This will be accomplished by the use of bandpass type filters and any notch type filter that may be necessary.
3. Interference:
- a. New lease applicants and potential lessee customers and tenants will be required to furnish an intermodulation study completed by a qualified engineer or other data pertaining to the effects of the proposed facilities on existing site users. For any new or major changes, potential electromagnetic interference must be addressed before construction can proceed. It will be the lessee's responsibility to assure that tenants and customers comply with these standards.

- b. When the BLM has communication facilities anywhere on the site, the lessee will route a copy of an application, technical data sheet, or equivalent form, from potential customers or tenants to the BLM for review. Thirty days will be allowed for the review. The lessee will not approve any customers or tenants in their facilities until the BLM agrees. When the BLM is not using the site, lessees may approve additional customers or tenants in their facilities without BLM approval, but the lessees still have the obligation to coordinate with the other site lessees and to resolve any potential interference problems before new uses are allowed. The suggested notification process for the lessee to use to advise existing customers and tenants of the new application, technical data sheet, or equivalent form is to send the form to all affected parties with a reasonable comment period.

- c. All users will cooperate in locating and eliminating interference. In the case of interference, the following procedure will be used:
 - 1) A customer or tenant who is experiencing interference will work with and through their facility owner/manager to ascertain if the interference is from other users in the same lease or from another lease.
 - 2) If the interference is determined to be from within the same lease, it is the lessee's and the affected customer or tenant's joint responsibility to resolve the problem.
 - 3) If the interference is determined to be from another lease, the lessee on the affected lease will contact the lessee of the suspected source(s) of the interference. The lessees will work together with their customers and tenants to resolve the problem.
 - 4) Should the lessees of other leases not be able to resolve the problem, the lessee who is experiencing interference will notify the BLM of the impasse and request the assistance in solving the matter. The BLM will request the assistance of the FCC if appropriate. The offending lessee(s) will bear all costs incurred by the BLM to resolve the problem. After such determination of responsibility if made by the BLM, the lessee from the responsible lease will take action to correct the situation upon receiving notice to do so from the responsible BLM Authorized Officer.

- d. Signal propagation corridors will be protected. No structure will be allowed to interfere with an existing microwave path or other directional radiation pattern.
- e. Lessees will notify all other lessees and the BLM (when the BLM is using the site) of any changes in their site configuration. These notifications will include any changes in frequencies, power output (ERP), antenna gain/pattern, or tower and building placement. A notification procedure is described in Section IV. K. 3. b. of this communication site management plan.

L. Roads, Parking Areas, and Disturbed Areas:

- 1. All roads and parking areas will be constructed to provide drainage and to minimize erosion. If deemed necessary by the BLM, culverts will be installed to maintain drainage. No dirt, rock, vegetation, or other fill material will be placed in the channels of any drainage without the written approval of the Authorized Officer. All earthmoving equipment used in connection with the site or road will be thoroughly washed down and cleaned of all mud, dirt, and vegetative debris at a location acceptable to the Authorized Officer. Cleaning of equipment will be accomplished immediately prior to initial mobilization and anytime the equipment is removed and returned to the communication site area or road.
- 2. All road construction, maintenance, and use will be confined to a maximum authorized width of 20 feet. Should road design not be adequate to contain traffic within the specified limits, additional measures including, but not limited to, surfacing, crowning, ditching, insloping, outsloping, and culverts may be required, as deemed necessary by the Authorized Officer.
- 3. Should off-site erosion develop due to inadequate road design, the lessee will install erosion control structures as are suitable for the specific soil conditions being encountered and which are in accordance with sound resource management practices.
- 4. All disturbed areas will be seeded in a manner and with a seed mixture specified by the BLM unless otherwise waived. However, areas within 20 feet of the site facilities will be managed in a manner specified in Section IV. J., of this communication site management plan.
- 5. As deemed necessary by the Authorized Officer, the lessee may be required to form and/or join a road user's association for the purpose of accomplishing joint maintenance of the subject road.

6. Failure of the lessee to share maintenance costs in dollars, equipment, materials or manpower proportionate to the lessee use with other authorized users may be adequate grounds to terminate the right-of-way grant.

M. Housekeeping:

1. Debris and the residue of construction, installation, removal, modification or other changes at the facilities, the site, and the road, will be removed as soon as reasonable, as specified by the BLM. Disposing of such material on BLM land will be done only with the BLM Authorized Officer's approval.
2. All facilities will be maintained in a neat, orderly fashion and reflect adherence to the communication site management plan and lease requirements.
3. No insecticides or herbicides will be used outside of the buildings unless approved by the BLM Authorized Officer. If noxious weeds become established, the lessee will be required to control the weeds.

N. Inspections requirements are two-fold - a general lease inspection and a tower inspection.

1. The general lease inspection will be performed by an independent party acceptable to the BLM Authorized Officer or by BLM employees. The focus of the inspection will be housekeeping items, grounding and bonding inspections which can be observed from ground level (antenna support structure which will be inspected separately), and inventory confirmation. Lessees will provide a copy of the inspection report to the BLM and correct deficiencies within 30 days unless a different deadline is approved by the BLM Authorized Officer. Lessees will pay reasonable costs for follow-up inspections needed to confirm that deficiencies have been corrected. The follow-up inspections will be performed at BLM choice by either an independent party acceptable to the BLM Authorized Officer or by BLM employees.
2. The antenna support structure (tower) inspection will be performed by the lessee and periodically by a tower expert (major inspections) according to standard ANSI/EIA/TIA-222 (current version). The recommendations in those standards will be considered requirements by the BLM. The lessee will provide a certified statement to the BLM that the inspection was performed and that all deficiencies were corrected within 30 days unless approved by the BLM Authorized Officer.

V. User's Association:

- A. After two or more leases have been issued, a User's Association may be formed. The basic function of the Association would be to provide advice to the BLM. There would be no intent to give the Association any jurisdiction over lessees; nor would lessees be required to join. Any such Association will be made up of one representative of each lessee and one customer or tenant at large who will represent all customers and tenants. The representative of the lessees will serve at each lessee's discretion. The single representative of all customers and tenants will be appointed by the BLM and serve at the BLM's discretion. Any constitution or bylaws, or their equivalents, will be approved by the BLM Authorized Officer.
- B. Suggested functions of an Association are as follows:
1. Accept an authorization on behalf of all site lessees for road development, maintenance, and use.
 2. Assist BLM with evaluation of new lease proposals when requested.
 3. Perform a general site inspection to deal with issues raised in Section IV. N. The purpose of this inspection would be to provide feedback to the BLM on general site conditions. The scope of the inspection would be confined to what can be seen on the outside of any lessee's facilities, unless a lessee specifically authorized the Association to enter such facilities.
 4. Assist the BLM, when requested, to resolve any issues arising between lessees. The BLM will not use the Association in this context without the agreement of all lessees and unless all lessees are represented. An individual lessee can waive their right to representation and authorize the Association, by written notice to the BLM, to proceed in their absence.

VI. Land Availability:

Any new construction will be confined to the area that has been specifically dedicated to this communication site as shown in Appendix A, Maps.

VII. Plan Implementation, Monitoring, and Revision:

- A. The Wrights Point Communication Site Management Plan will become final and be implemented when it is approved by the Three Rivers Resource Area Field Manager. It will become the primary reference document for management of the site, and will be incorporated by reference into all new leases and renewals of existing leases at the site.
- B. The BLM will periodically make compliance or monitoring checks of all site users to determine if they are operating within the parameters of their approved right-of-way grant. These checks may be done on a basis determined by BLM or upon the request of the site User's Association.
- C. The Wrights Point Communication Site Management Plan will only be revised when the management actions prescribed no longer meet the communication management objectives, when those objectives are no longer valid, or when unforeseen circumstances require revision. If this communication plan is no longer valid, revision will be made using those steps and criteria identified in the current version of BLM Manual 2860.1.11.A., including public participation and the appropriate approvals.

VIII. Application Procedures:

- A. No approval is needed if the communication use can be accommodated within an authorized existing facility (tenant/customer).
- B. Memorandum, manuals, regulations, and law which prescribe evaluation and approval methods include BLM Manual 2800 and 2860, Siting Wireless Facilities, Executive Memorandum, August 10, 1995, Telecommunications Act of 1996, GSA Bulletin "Placement of Commercial Antennas on Federal Property," June 11, 1997, and the Reference Book "Siting Wireless Antennas, An Introduction," Federal Land Manager's Version, Produced by Cellular Telecommunication Industry Association (CTIA), BLM, and U.S. Department of Agriculture, United States Forest Service.
- C. Applicant contacts the BLM to arrange a pre-application meeting, the applicant completes a draft of the Application for Transportation and Utility Systems and Facilities on Federal Lands, SF-299, and a map. The BLM identifies and requests additional information needs and encourages the applicant to collocate with an existing facility.
- D. The applicant finalizes the SF-299 application form, map, and a communication site technical data report/FCC License, then submits the package to the BLM.

- E. After receipt of a completed application package, the BLM processes it and issues lease within 60 days. This is done by serializing the application and setting up a right-of-way file; completing NEPA documentation, including decision; preparing a draft communication site lease for comment and review; requesting comments from existing site users; all technical electronic aspects of the proposal sent to FCC for review (FCC file number and city of broadcast must be present); determines rent and monitoring fees; and prepares and mails a decision letter to an applicant.
- F. The applicant accepts stipulations of the lease and communication site management plan, signs and returns the SF-299 and Form 2800-18, with rent and monitoring fees to the BLM.
- G. BLM authorizes the Communications Use Lease and Application for Transportation and Utility Systems and Facilities on Federal Lands. The applicant now becomes the lessee and must notify BLM of the planned construction start date and arrange for a preconstruction meeting and follows through with all the requirements for the lease and communication site management plan.

IX. Approvals:

Prepared by:	Holly LaChapelle, Land Law Examiner	Date
Recommended by:	Skip Renschler, Realty Specialist	Date
Recommended by:	Al Foulke, Telecommunication Specialist	Date
Approved by:	Three Rivers Resource Area Field Manager	Date

X. Appendix A, Maps:

See Attached Map.