

**Canyon Mountain Communication Site
Management Plan
Environmental Assessment
South River Field Office
EA # OR-105-99-11**

Date Prepared: December 22, 2000

Decision Record

Decision:

It is my decision to authorize the implementation of Alternative 4, modified to allow a maximum of five towers at full site development, instead of four. The five towers will consist of two towers not to exceed 90 feet in height, and three towers not to exceed 199 feet in height. Authorization of an additional tower would meet the *Purpose and Need* of providing sufficient facilities to meet the anticipated demand for siting of wireless communications services identified in the EA (p. 1), and allow greater flexibility in siting users until such time as the 85, 90, and 150 foot towers currently on site are replaced with facilities that can accommodate larger numbers of users than at present. This modification is within the scope of impacts and consequences analyzed in the EA. All other features of Alternative 4 are adopted as described in the EA.

Concurrent with authorization of the implementation of Alternative 4, as modified, for the physical development of the Canyon Mountain Communication Site, I am adopting the final site management plan. The site management plan is an administrative plan and incorporates the developmental considerations, mitigation, and environmental protections contained in Alternative 4, as modified. It also provides the administrative framework for the daily operations of the site, and as such, is subject to change as management direction, authorizations and legal requirements change.

Rationale for the Decision:

This decision is based upon the following:

Alternative 1 would not meet the *Purpose and Need* expressed in the EA (p. 2), “. . . to develop a management plan governing the development, leasing and operations of communications facilities and services on Canyon Mountain, in order to facilitate orderly management and compatible communication site growth while minimizing impacts to the environment.” Alternative 1 would not limit site expansion, would require preparation of an EA for each proposed new siting, and would not provide an overall administrative plan for the site. This alternative would also be contrary to the objectives of BLM Manual Section 2860.11 which direct that site management plans be developed for sites which can accommodate multiple users, because in the absence of such a plan the BLM cannot require

prospective users to provide towers and equipment shelters capable of providing for multiple users. This alternative would not constrain development on adjoining ridges where construction would compromise Visual Resource Management (VRM) objectives. Additionally, as described in the EA (p. 16), this alternative would pose the greatest potential risk of neo-tropical and migratory bird mortality associated with tower collisions.

Alternative 2 would not meet the anticipated needs and demand of cellular and wireless communications providers identified in the *Purpose and Need* (EA, p. 1), because it would not allow for the construction of additional towers, and would limit the height of replacement towers to the same heights of those presently on site. Current tower heights do not provide sufficient elevation for clear beam paths and line-of-sight transmission between successive installations, nor between customers and tower relays. Most of the present facilities are also fully utilized and incapable of accommodating additional users. Replacement of facilities in-kind would not meet the anticipated demand. Additionally, this alternative would not meet the Roseburg District *Record of Decision and Resource Management Plan* (ROD/RMP, p. 69) objective of making BLM-administered lands available for needed rights-of-way, nor would it meet the objectives of the Telecommunications Act of 1996 and a Presidential Memorandum dated August 10, 1995, published in the Federal Register (Vol. 60, No. 156, Presidential Documents, pp. 42023-4, August 14, 1995) directing executive departments and agencies to make Federal Government buildings and lands available for siting of mobile service antennas.

Alternative 3 would not adequately meet the *Purpose and Need* of the EA (p. 2), for orderly management and compatible development of the site. It would authorize the retention or replacement of all existing towers, while allowing the construction of up to five additional towers. This would not be consistent with the objective of orderly development because it would limit location options for the siting of new towers and would not allow for the maximum utilization of the limited space available on the site. As with Alternative 1, this alternative would also pose a heightened risk of bird mortality arising from tower collisions, primarily as a consequence of the large number of towers that could exist on the site.

Alternative 4, as described in the EA, would likely fail to meet the anticipated demand for siting of communications facilities identified in the *Purpose and Need* of the EA (p. 1). This alternative would only allow for the construction of a single new tower until such time as the existing 85, 90, and 150 foot towers are replaced with facilities that can accommodate larger numbers of users than at present. As noted above in the discussion of Alternative 2, this would not be consistent with the objective of the ROD/RMP, the Presidential Memorandum of August 10, 1995, published in the Federal Register (Vol. 60, No. 156, Presidential Documents, pp. 42023-4, August 14, 1995), or the Telecommunications Act of 1996.

Public Comment

Comments on this analysis were received from one individual and one organization. No comments were received from any current users of the communication site, other members of the communication industry, nor any tribal, local, state, or Federal government agencies. No issues were identified which were not addressed in the environmental analysis. The following points of clarification are provided. The information is contained in the environmental assessment or documents referenced there.

1. Why is the 150-foot tower currently located on Canyon Mountain lit?

The BLM does not have authority to dictate the manner of tower lighting. The BLM may only specify that it be limited to the minimum acceptable to the Federal Aviation Administration (FAA). The FAA specifies that towers 150 feet or greater in height must be illuminated. The Oregon Department of Aeronautics also requires tower lighting in some instances. Canyon Mountain is adjacent to Interstate Highway 5. This is also a major north-south flight corridor for aircraft. As a consequence, the Oregon Department of Aeronautics requires lighting on towers in excess of 100 feet in height along this corridor.

2. We understand that alternative 4, with its limit of 4 towers, will accommodate the same number of users as the other alternatives.

The BLM does not expect that each of the alternatives would be capable of accommodating the same number of users. As discussed above, some of the alternatives would not meet anticipated demand for siting.

3. The site boundaries should not be expanded for Alternative 4.

The communication site boundaries under Alternative 4 are the same as for the present site configuration. In the analysis for the EA, possible future expansion was considered based on a request from a cellular service provider, and because multi-user towers could require larger equipment shelters than could currently be accommodated, and because the potential for service interference between users could require a greater degree of spatial separation between towers. The additional area is presently unavailable for development because of the presence of Survey and Manage species. This area will remain unavailable for development unless future management direction for these species changes.

4. The EA does not explain why it is necessary to allow tower heights to increase to 199 feet.

The authorization of towers up to 199 feet in height was considered a reasonable limit based on information derived from requests to locate on Canyon Mountain. Actual heights will be dependent on user needs. The need for the taller towers is discussed above, under **Rationale for the Decision, Alternative 2.**

5. Are the two temporary towers identified in the EA a part of the complement of 6 towers discussed under Alternative 2?

The erection of two temporary towers was authorized under a temporary, non-renewable right-of-way that expires in December of 2002. Only one of the authorized towers was sited and will be removed on or prior to expiration of the right-of-way authorization. This temporary tower is not a part of the complement of the 6 towers discussed under Alternative 2.

6. BLM should encourage users to build low towers, not the 199-foot limit. If lower tower heights are possible, strobe lights could be eliminated.

As discussed above, under **Rationale for the Decision, Alternative 2**, lower tower heights would not meet communication service needs. The 199-foot limit on tower heights is the maximum allowed by the decision. Actual tower heights, up to but not exceeding this height, will be dependent on user needs. As has also been previously noted, lighting requirements are not within the discretion of the BLM. As described in the EA (p. 16), strobe lights are considered preferable to fixed beacons, as they are considered less likely to attract birds migrating at night. The VRM objectives for this area are being met. Only potential site expansion to adjoining areas, as described under **Rationale for the Decision, Alternative 1**, would compromise these objectives.

7. No effects analysis was done on the existing guyed towers. If these towers are allowed to remain for an extended period of time, the EA should have analyzed the negative effects.

The presence of guyed towers was analyzed because they are a part of the existing environment against which the proposed action is measured. They were considered in the discussion of *Environmental Consequences* in the EA (pp. 16-17) in regard to the effects on migratory birds.

8. The site plan assumes Alternative 3 or 4 will be chosen, it states that towers higher than 200 feet will be allowed, and it states that guyed towers will be allowed.

The EA (p. 3) noted that the "Draft" site management plan (Appendix B) would be subject to modification with the selection of an alternative in the final decision which would provide the basis for the development of the final administrative and electrical management elements of the plan. This decision does not authorize construction of towers greater than 200 feet in height, nor does it authorize construction of guyed towers. Requests for such structures would require analysis, preparation of a separate EA, and a subsequent decision to authorize them. Identifying the requirements for special approval in the site management plan does not constitute a decision or authorization and is not outside the scope of the effects analyzed in the EA.

9. The site plan states that gasoline and diesel will not be allowed for generating power, but that propane will. The BLM should also consider solar or wind power generators.

Use of propane for power generation is common at communication sites as a back-up in the event of a service outage, not as a sole source of power. The construction of solar arrays or wind turbines was considered outside the scope of this analysis and was not addressed.

10. Page 11 of the site management plan does not detail what monitoring will be performed.

The site management plan clearly identifies compliance monitoring that will be conducted. This monitoring will determine compliance by rights-of-way holders with the terms and conditions of the grants that authorize their use of the site, adherence to applicable rules and regulations established by other agencies such as OSHA and the FCC, and adherence to the requirements of the site management plan. Monitoring requirements relative to the ROD/RMP is described below.

Compliance and Monitoring:

Monitoring of the environmental effects of site development would be done in accordance with requirements stipulated on pages 84-86 of the ROD/RMP. Specific monitoring criteria applicable to Wildlife Habitat, Special Status and SEIS Special Attention Species Habitat and Visual Resources are contained in Appendix I of the ROD/RMP (pp. 195-198 and pp. 202-203), as stated in the EA (p. 19).

Appeals Procedures: As outlined in 43 CFR Part 4, Subpart E, § 4.410 through 4.413, appeals may be filed with the authorized officer within 30 days of the publication date of the Decision Notice in the *News-Review*.

E. Dwight Fielder, Field Manager
South River Field Office

Date