



Date: January 2, 2008

CD-07-08-G- Klickitat County PUD Power Line

DECISION MEMO and CONSISTENCY DETERMINATION
USDA, Forest Service, Columbia River Gorge National Scenic Area

Jennifer Wade, Project Manager

Proposed Action: This proposal involves authorization of a new 7.2 kV overhead power line. This line would stem off of an existing 66kV overhead power line the main line needing reauthorization that crosses the W $\frac{1}{2}$ SW $\frac{1}{4}$ sec. 9, T. 2N, R. 15E. and travel in a generally southwesterly direction across NFS land approximately 827' to the south boundary of section 9, where it would then enter onto private land for an additional 330'. The easement will be 28' wide – 14' each side of centerline. Two new poles would be placed on NFS land – one just south of Hwy. 14 inside of the State's easement, and one just south of Wishram Road within Klickitat County's easement. The poles would be 40' wooden poles with crossarm construction. The poles would be buried 6 feet deep. This new line would cross over Hwy. 14. The PUD has an approved permit from WSDOT, permit U1361, to cross the highway. Two addition poles would be placed on private property in section 16.

Location: Township: 2N Range: 15E Quarter section: w $\frac{1}{2}$ sw $\frac{1}{4}$. **Note:** Klickitat County incorrectly displays landownership in section 9. Land under jurisdiction of the Forest Service is indicated to be "Indian land".

Purpose: The purpose of this project is to authorize Klickitat County PUD to cross National Forest System lands to economically provide electricity for 2 dwellings and to reauthorize the existing line.

Need: The residents are currently without power.

Scoping and Public Involvement: A scoping letter describing the project was sent to a mailing list of known interested parties and adjacent landowners on October 12, 2007. Comment was received on November 13, 2007 from Friends of the Columbia Gorge. Friends is concerned that the project meet the standards and guidelines of the Management Plan and NEPA regulations. The enclosed Findings of Fact review the project under Management Plan guidelines.

Reason For Categorically Excluding the Proposed Action: I have determined that the proposed action is categorically excluded. Therefore, neither an environmental impact statement nor environmental assessment will be prepared. I make this determination based on the following findings:

1. I find the proposed action fits under Category 2, Section 31.2 Forest Service Handbook 1909.15-92.1, February 15, 2007: "Additional construction or reconstruction of existing telephone or utility lines in a designated corridor".
2. I also find the proposal does not involve extraordinary circumstances:
 - a. Biological evaluation concluded that there would be no effects to any threatened, endangered or sensitive species of plant or animal. The project is in compliance with the Migratory Bird Treaty Act.
 - b. The Forest Service specialists did not identify any adverse effects of the restoration project to cultural resources, steep slopes, erosive soils, floodplains, wetlands, or other special areas or

- resources. The project is not located within or adjacent to any inventoried roadless areas or Natural Areas.
- c. The project does not affect any reserved treaty rights of Native Americans.
 - d. There are no unusual effects to minority or low-income populations by the proposed action.
3. I have also determined that the proposed action is consistent with the Land and Resource Management Plan for the Gifford Pinchot National Forest as amended by the Northwest Forest Plan.
 4. I find that this project is consistent with the Columbia River Gorge National Scenic Area (CRGNSA) Management Plan provided that it is implemented as described in the CRGNSA Consistency Determination Findings of Fact, referenced as CD-07-08-G, and the following conditions are applied:
 - a. Site the pole closest to SR-14 an additional 15-20 feet away from SR-14
 - b. The poles and all components shall be of a dark earth-tone color.
 - c. All soil disturbance shall be re-vegetated with native plantings before the fall rains.
 - d. If any historic or prehistoric cultural resources are uncovered during project activities, work shall cease and the CRGNSA archeologist shall be notified. The Forest Service shall also notify the Washington State Historic Preservation Office and the Indian Tribal Governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.
 5. The Findings of Fact attached to this Decision Memo and Consistency Determination form the basis of fact for my decision on federal lands.

Decision: I have decided to authorize the utility lines as described above because implementation of the project meets the stated purpose and need and can be accomplished with minimal environmental impacts.

Implementation Date: This project may begin immediately as long as it complies with the conditions as described in item 4(a-d) above.

Appeal Opportunities: The NEPA portion of this decision is not subject to appeal pursuant to Forest Service regulations at 36 CFR 215.8 (a)(4). A written request for review of the Consistency Determination, with reasons to support the request, must be received within 20 days of the date shown with the Area Manager signature below. Requests for review are addressed to: Request for Review, Regional Forester, P.O. Box 3623, Portland, OR 97208.

Contact Person: The Columbia River Gorge National Scenic Area staff prepared an analysis file in conjunction with this project. For further information, contact Diana Ross at the Columbia River Gorge National Scenic Area, 541.308.1716, e-mail: dlross@fs.fed.us.

/s/Daniel T. Harkenrider

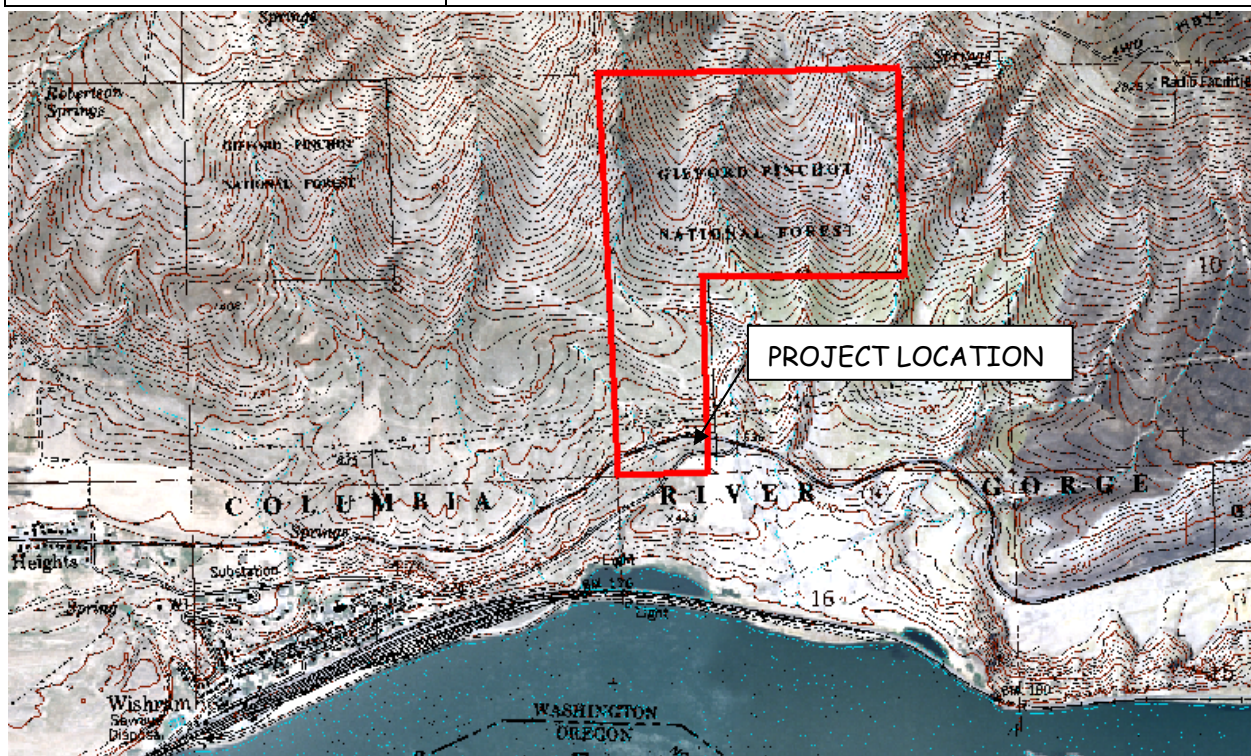
DANIEL T. HARKENRIDER
Area Manager

Date: January 2, 2008

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

FINDINGS OF FACT

LANDOWNER:	USA--USDA, Forest Service
PROPOSED ACTION:	Utility Line Authorization .
LOCATION	Skamania, Township 2N Range 15E, Section 9 UTM: 660329 5058853
NATIONAL SCENIC AREA DESIGNATION:	General Management Area (GMA)
LAND USE DESIGNATION:	Large Scale Agriculture-Minimum Parcel 160 acres
LANDSCAPE SETTING:	Grasslands



FINDINGS OF FACT:

The following findings of fact contain the applicable standards and guidelines from the CRGNSA Management Plan, as revised and adopted in 2004. Some guidelines are indicated as not applicable with the abbreviation N/A. These are not applicable due to type of project and/or location. The CRGNSA Management Plan standards and guidelines are displayed in **bold type**. The findings are displayed in regular type.

A. Project Proposal

This proposal involves authorization of a new 7.2 kV overhead power line. This line would stem off of an existing 66kV overhead power line the main line that crosses the W $\frac{1}{2}$ SW $\frac{1}{4}$ sec. 9, T. 2N, R. 15E. and travel in a generally southwesterly direction across NFS land approximately 827' to the south boundary of section 9, where it would then enter onto private land for an additional 330'. The easement will be 28' wide – 14' each side of centerline. Two new poles would be placed on NFS land – one just south of Hwy. 14 inside of the State's easement, and one just south of Wishram Road within Klickitat County's easement. The poles would be 40' wooden poles with cross-arm construction. The poles would be buried 6 feet deep. This new line would cross over Hwy. 14. The PUD has an approved permit from WSDOT, permit U1361, to cross the highway. Two addition poles would be placed on private property in section 16.

B. Public Comment

A scoping letter describing the project was sent to a mailing list of known interested parties and adjacent landowners on October 12, 2007. Comment was received on November 13, 2007 from Friends of the Columbia Gorge. Friends is concerned that the project meet the standards and guidelines of the Management Plan and NEPA regulations. The enclosed Findings of Fact review the project under Management Plan guidelines. The decision memo reviews NEPA regulations.

C. Land Use Designations

1. The Management Plan, Part II, Chapter 1 (Agricultural Land) GMA Guidelines, states:
2. **The following uses may be allowed on lands designated Large-Scale or Small-Scale Agriculture, subject to compliance with the guidelines for the protection of scenic, cultural, natural, and recreation resources and the "Approval Criteria for Specified Review Uses," below.**
 - A. **Utility facilities and railroads necessary for public service upon a showing that (1) there is no practicable alternative location with less adverse effect on agricultural or forest lands, and (2) the size is the minimum necessary to provide the service.**

Approval Criteria for Specified Review Uses

1. **The uses identified under Guideline 2 under "Review Uses," above, may be allowed only if they meet both of the following criteria:**
 - A. **The use is compatible with agricultural uses and would not force a change in or significantly increase the cost of accepted agricultural practices on nearby lands devoted to agricultural use.**
 - B. **The use will be sited to minimize the loss of land suitable for the production of crops or livestock.**

Findings: The proposed power line will serve residential properties that currently have no access to public power. The proposed line is the only way that public power can be brought to these properties. The proposed siting of the power line involves placing poles only immediately adjacent to the existing roadways of SR 14 and Wishram Road. This placement will minimize or eliminate any adverse effects to agricultural lands. There are no forest lands in the vicinity of the proposed line. The proposed line is only long enough to reach the residential properties it is intended to serve. It is only tall enough to satisfy industry standards for power pole heights.

The proposed power line will entail placing four power poles immediately adjacent to the right-of-ways of SR 14 and Wishram Road. This placement will minimize the loss of land suitable for agriculture because it is unlikely that agriculture would occur so close to the right-of ways. The proposed line will have no effect on nearby agricultural practices.

D. Scenic Resources

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

KEY VIEWING AREAS

1. **The guidelines in this section shall apply to proposed developments on sites topographically visible from key viewing areas.**
2. **Each development shall be visually subordinate to its setting as seen from key viewing areas.**
3. **Determination of potential visual effects and compliance with visual subordination policies shall include consideration of the cumulative effects of proposed developments.**

4. The extent and type of conditions applied to a proposed development to achieve visual subordination shall be proportionate to its potential visual impacts as seen from key viewing areas.

Findings: The project is topographically visible from three Key Viewing Areas. The project is in the foreground of Highway 14 from where it is most visible. The project is in the middle ground from the Columbia River, and I-84 and will meet visual subordination from these viewpoints due to distance and size of the poles and wires. According to the applicant, rocky terrain combined with the expense of boring under two roads and the difficulty of obtaining permission to bore under SR-14, makes undergrounding of the power lines impracticable. In order to meet the requirement of visual subordination from the foreground of SR-14, the following conditions should be placed:

- Site the pole closest to SR-14 an additional 15-20 feet away from SR-14
- The poles and all components shall be of a dark earth-tone color.

KEY VIEWING AREA	DISTANCE ZONE		
	FOREGROUND 0-1/4 Mile	MIDDLEGROUND 1/4 to 3 Miles	BACKGROUND Over 3 Miles
Columbia River		X	
SR-14	X	X	
I-84		X	
Historic Columbia River Hwy			
Sandy River			
Pacific Crest Trail			
Portland Women’s Forum			
Crown Point			
Rooster Rock State Park			
Larch Mtn. Road			
Larch Mountain			
Larch Mtn. Sherrard Point			
Cape Horn			
Bridal Veil State Park			
Multnomah Falls			
Bonneville Dam Visitor Center			
Beacon Rock			
Dog Mtn. Trail			
Cook-Underwood Road			
Wyeth Bench Road			
Oregon Highway 35			
Panorama Point Park			
SR-141			
SR-142			
Old Highway 8			
Rowena Plateau/Conservancy VP			

Cumulative Effects

The proposed project will be visible in conjunction with a very visible high voltage power line and will cumulatively add negative scenic effects. However, the Gorge Commission found the following in their corresponding review of this project (C06-0015-K-G-21): “...the uniqueness of the project area precludes many similar developments: the proposed power line will serve four approximately 5-acre lots in a residential subdivision created prior to the National Scenic Area Act. This subdivision is unique in this portion of the General Management Area (GMA), being surrounded by much larger lots dedicated to agriculture. Furthermore, the 160-acre minimum lot size in this portion of the GMA prevents the creation of similar subdivisions. Hence, the unique combination of circumstances that have resulted in the need for the

proposed power line is unlikely to again occur in the surrounding area...” Therefore, the project’s reasonably small cumulative effects will be considered with regard to the application of scenic conditions of approval.

5. **New development shall be sited to achieve visual subordination from key viewing areas...**
6. **New development shall be sited using existing topography and/or existing vegetation as needed to achieve visual subordination from key viewing areas.**
7. **Existing tree cover screening proposed development from key viewing areas shall be retained...**
8. **The silhouette of new buildings shall remain below the skyline of a bluff, cliff, or ridge as seen from key viewing areas.**
9. **An alteration to a building built before November 17, 1986, that already protrudes above the skyline of a bluff, cliff, or ridge as seen from a key viewing area, may itself protrude above the skyline if:...**

Findings: See findings above for visual subordination from key viewing areas. The proposed project will not break the skyline from key viewing areas. The project is located at a lower elevation than the surrounding landscape from key viewing areas. No trees will be removed. According to the applicant, the proposed utility pole closest to SR-14 can be sited further from SR-14 than proposed in order to achieve visual subordination from Highway 14.

10. **The following guidelines shall apply to new landscaping used to screen development from key viewing areas-**
11. **Conditions regarding new landscaping or retention of existing vegetation for new developments on lands designated GMA Forest ...**

Findings: No screening vegetation is proposed due to the rocky grasslands location, the location outside of any irrigated area, and the height of the poles needing screening.

12. **Unless expressly exempted by other provisions in this chapter, colors of structures on sites visible from key viewing areas shall be dark earth-tones found at the specific site or in the surrounding landscape. The specific colors or list of acceptable colors shall be included as a condition of approval. The Scenic Resources Implementation Handbook will include a recommended palette of colors.**
13. **The exterior of buildings on lands seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity, unless the structure would be fully screened from all key viewing areas by existing topographic features...**
14. **In addition to the site plan requirements in "Review Uses" (Part II, Chapter 7: General Policies and Guidelines), applications for all buildings visible from key viewing areas shall include a description of the proposed building(s)' height, shape, color, exterior building materials, exterior lighting, and landscaping details (type of plants used; number, size, locations of plantings; and any irrigation provisions or other measures to ensure the survival of landscaping planted for screening purposes).**

Findings: See findings on visual subordination above. No buildings are proposed.

15. **Mining N/A**

16. Exterior lighting shall be directed downward and sited, hooded, and shielded such that it is not highly visible from key viewing areas. Shielding and hooding materials shall be composed of non-reflective, opaque materials. N/A
17. Additions...N/A
18. Rehabilitation of or modifications to existing significant historic structures...N/A

Findings: None of the above guidelines are applicable to this project for reasons of project type and location.

19. New main lines on lands visible from key viewing areas for the transmission of electricity, gas, oil, other fuels, or communications, except for connections to individual users or small clusters of individual users, shall be built in existing transmission corridors unless it can be demonstrated that use of existing corridors is not practicable. Such new lines shall be underground as a first preference unless it can be demonstrated to be impracticable.

Findings: The project was sited in existing corridors until necessary to branch off to supply residences.

New communication facilities-N/A

21. New communications facilities-N/A
22. Overpasses-N/A
23. Except for water-dependent development and for water-related recreation development, development shall be set back 100 feet from the ordinary high water mark of the Columbia River below Bonneville Dam, and 100 feet from the normal pool elevation of the Columbia River above Bonneville Dam, unless the setback would render a property unbuildable. In such cases, variances to this guideline may be authorized. N/A

Findings: None of the above guidelines are applicable to this project for reasons of project type and location.

24. New buildings shall not be permitted on lands visible from key viewing areas with slopes in excess of 30 percent...N/A
25. Driveways and buildings shall be designed and sited to minimize visibility of cut banks and fill slopes from key viewing areas.
26. All proposed structural development involving more than 200 cubic yards of grading on sites visible from key viewing areas shall include submittal of a grading plan...
- 27-30. Expansion of existing quarries and new production and/or development of mineral resources... N/A

Findings: None of the above guidelines are applicable to this project for reasons of project type and location.

LANDSCAPE SETTINGS

Grasslands



Design Guidelines

1. Accessory structures, outbuildings, and access ways shall be clustered together as much as possible. Exceptions to this guideline are permitted where necessary for farming operations.
2. In portions of this setting visible from key viewing areas, the following guidelines shall be employed to achieve visual subordination for new development and expansion of existing development:
 - A. Structures shall be sited on portions of the property that provide maximum screening from key viewing areas, using existing topographic features.
 - B. Lower structures that emphasize horizontal lines and blend with this sweeping landscape should be encouraged rather than very tall structures.
 - C. Planting of trees for screening shall not be extensive, in character with the openness of this setting. Where used, screening vegetation shall either tie in with nearby riparian vegetation in seasonal drainages or emulate windrows. At least half of any trees planted for screening purposes shall be species native to the setting or commonly found in the area. Such species include Oregon white oak, Lombardy poplar, black locust, black cottonwood (wet locations), Russian olive and ponderosa pine.

Findings: The photo above shows an existing pole to be used to carry the utility line across SR-14. No vegetative screening is available or ecologically feasible due to the rocky nature of the native grasslands and the location away from sources of irrigation or natural seeps or swales. Lower structures are also not feasible as the height is dictated by the need to safely clear SR 14. No accessory structures are proposed. Therefore, the project meets the landscape setting design guidelines.

E. Cultural Resources

1. The Management Plan, Part I, Chapter 2 (Cultural Resources), GMA Guidelines, states:
Federal agencies shall follow steps 1 through 5 under guideline 4, below, for new developments or land uses on all federal lands, federally assisted projects, and forest practices. (Literature Review and Consultation Evaluations of Significance Assessment of Effect.)

(These steps include: 1) Literature Review and Consultation; 2) Field Inventory; 3) Evaluations of Significance; and 4) Assessment of Effect.)

(8) The Forest Service shall consult with the Indian Tribal Governments and other consulting parties in performing steps 1 through 5 under guideline 4.”

Findings: Marge Dryden, CRGNSA archeologist report dated August 9, 2006 that “the undertaking named above meets the conditions listed in Appendix A and will be excluded from case-by-case review because it falls within actions for which a survey is not required under the NSA Management Plan”. However, a condition should be placed requiring that the Forest Service cease work and immediately notify the Washington State Office of Archeology and Historic Preservation if historic or prehistoric cultural resources are uncovered during construction activities. The Forest Service should also notify the Indian Tribal Governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.

F. Natural Resources

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

WETLANDS GMA GUIDELINES

Findings: This project is not within a wetland or wetland buffer.

STREAMS, PONDS, LAKES AND RIPARIAN AREAS- GMA GUIDELINES

Findings: The project is within about 700 feet of an intermittent stream and therefore is outside of its required 50 foot buffer.

3. Wildlife and Plants

- A. Protection of sensitive wildlife/plant areas and sites shall begin when proposed new developments or uses are within 1000 ft of a sensitive wildlife/plant site and/or area. Sensitive Wildlife Areas are those areas depicted in the wildlife inventory and listed in Table 2, including all Priority Habitats listed in this Chapter. The approximate locations of sensitive wildlife and/or plant areas and sites are shown in the wildlife and rare plant inventory.**
- B. The local government shall submit site plans (of uses that are proposed within 1,000 feet of a sensitive wildlife and/or plant area or site) for review to the Forest Service and the appropriate state agencies (Oregon Department of Fish and Wildlife or the Washington Department of Wildlife for wildlife issues and by the Oregon or Washington Natural Heritage Program for plant issues).**
- C. The Forest Service wildlife biologists and/or botanists, in consultation with the appropriate state biologists, shall review the site plan and their field survey records...:**

Findings: According to the sensitive plant inventory, the site is within 1,000 feet of a sensitive plant, smooth desert parsley. Robin Dobson, CRGNSA botanist/ecologist stated that the utility line is not likely to affect this population because this plant prefers cliffs habitat and the project is over 900 feet from the edge of the already buffered known population polygon. In addition, the Gorge Commission review of the project on land closer to the population quoted Sandy Moody of the Washington Natural Heritage Program as saying that the “project isn’t likely to affect the known rare plant population”. The project is not within any known sensitive wildlife areas. Based on all of the Natural Resource findings above, the project meets Natural Resources criteria.

G. Recreation Resources

1. The Management Plan, Part II, Chapter 7(Review Uses), SMA/GMA Guidelines, states:
8. If new buildings or structures may detract from the use and enjoyment of established recreation sites on adjacent parcels, an appropriate buffer shall be established between the building/structure and the parcel.

Finding: No recreation uses are proposed. There are no developed recreation uses on the parcel. There are no recreation uses that would benefit from a buffer on adjacent parcels.

H. Conclusion

The proposed power line, as described above, for the Columbia River Gorge National Scenic Area is consistent with the National Scenic Area Management Plan Policy and Guidelines provided it meets the criteria and conditions listed in the Findings of Fact and Consistency Determination.