

PO Box 730 • #1 Town & Country Square • White Salmon, Washington 98672 • 509-493-3323 • fax 509-493-2229
www.gorgecommission.org

MINOR CHANGE TO DIRECTOR'S DECISION

APPLICANT: Verizon Wireless

LANDOWNER: Barbara Sexton

FILE NO.: C09-0010-K-G-21

ORIGINAL REQUEST:

To install a wireless communication facility with antennas on an existing BPA transmission tower, equipment cabinets in a fenced area beneath the BPA tower, and a generator on a concrete slab with a fence approximately 100 feet southeast of the tower, and to construct a gravel access road to the site.

REQUEST WITH MINOR CHANGE:

The same development as approved in the original request with additions of a microwave antenna two (2) feet in diameter located on the BPA tower, a telco cabinet adjacent to the proposed access road, and a service light located beneath the BPA tower. The applicant also requests to shift the location of the turnaround area 10 feet further from the BPA tower and change the color of the coaxial cables from dark grey to black.

LOCATION: The subject parcel is located at 20 Balch Road, Lyle, in the NW ¼ of Section 28, Township 3N, Range 12E, Willamette Meridian, Klickitat County, Washington. (Klickitat County Assessor's ID #0312280000600)

LAND USE DESIGNATION: The subject parcel is in the General Management Area and is designated Small-Scale Agriculture.

AUTHORITY TO APPROVE MINOR CHANGE:

This application was received and reviewed under Commission Rule 350-81. The proposed minor changes are therefore being reviewed pursuant to Commission Rule 350-81-046.

Commission Rule 350-81-046 states:

Any change to a development action approved by the Executive Director shall be processed as a new action, except that the Executive Director may approve minor changes to findings, conclusions, and conditions of approval deemed to be consistent with the guidelines of Commission Rule 350-81 and the findings and conclusions for the original action. If the Executive Director approves a minor change, the Director shall notify all of the parties that would have standing to appeal the change, including the applicant, the Forest Service, the four Indian tribal governments, the county planning department, and anyone who submitted comments during the comment period on the original land use application. The change itself (not the original decision) would be subject to appeal under the same time frames applicable to the original decision.

DECISION:

Based upon the following findings of fact of the original decision and the amended findings attached, the land use application by Verizon Wireless to install a wireless communication facility as described above is found to be consistent with the standards of Section 6 and the purposes of the Columbia River Gorge National Scenic Area Act P.L. 99-663, and the Management Plan for the Columbia River Gorge National Scenic Area (Management Plan), and approvable under Commission Rule 350-81 and is hereby **approved**.

CONDITIONS OF APPROVAL: *(Note: Any changes to the conditions of approval are underlined)*

The following conditions of approval are given to ensure that the subject request is consistent with the standards of Section 6 and the purposes of P.L. 99-663, and the Management Plan and approvable under Commission Rule 350-81. **These conditions must be recorded in county deeds and records to ensure notice of the conditions to successors in interest** (Management Plan, Review Uses Guideline 1, pg. II-96).

1. Locations for all new structures, roads and other ground-disturbing development shall be staked for Commission inspection prior to grading or excavation. The applicant shall notify the Commission once staking is complete to arrange for an inspection. Grading and excavation may begin after Commission inspection and approval of staking.
2. The development shall be sited and constructed as shown on the approved site plan and elevation drawings.
3. Two new trees shall be planted as shown on the approved site plan. These trees shall be at least four feet tall at planting. Both trees shall be coniferous and at least one tree shall be a species native to or commonly found in the area, such as ponderosa pine or Douglas fir. Landscaping shall be installed as soon as practicable, and prior to project completion. Applicants and successors in interest for the subject communications facility are responsible for the proper maintenance and survival of planted vegetation, and replacement of such vegetation that does not survive.
4. The privacy slats in the fences around the equipment cabinets beneath the BPA tower and around the power compound shall be a dark brown color. The equipment cabinets, telco cabinet and power generator also shall be painted dark brown. Ace Quality Paints' "Chocolate Chip" (25A-1A) or equivalent is approved for the dark brown color. The panel and microwave antennas and cables shall be painted a dark grey color. Rodda Paint's Coal (531 (3)) or equivalent is approved. The final color selections shall be submitted to and approved by the Principal Planner prior to painting.
5. All graded areas, including the fill slope for the generator compound, shall be reseeded with native grasses to minimize the visibility of graded areas from key viewing areas. The reseeded shall occur as soon as practicable, and prior to project completion.
6. ~~No outdoor lighting is approved in this Director's Decision. Any future proposed outdoor~~ One exterior task light is proposed. A revised detail drawing of the task light showing it is directed downward shall be submitted for review and approval by the Executive Director prior to installation. Information demonstrating the shielding material is opaque and non-reflective shall also be submitted for review prior to installation. Future lighting will be reviewed to ensure it is directed downward and sited, hooded and shielded so as to not be highly visible from key viewing areas.

7. The applicant shall notify the Gorge Commission within 30 days of project completion to arrange for an inspection to confirm compliance with conditions of approval. Project completion means completion of all work on exteriors of structures (including painting), completion of grading and excavation and installation of any required screening vegetation.
8. If cultural resources are discovered during construction activities, all activities within 100 feet of the cultural resources shall cease and the applicants shall notify the Gorge Commission within 24 hours. The cultural resources shall remain as found; further disturbance is prohibited until permission is granted by the Executive Director of the Gorge Commission.
9. If human remains are discovered during construction activities, all activities shall cease upon their discovery. Local law enforcement, the Executive Director and Indian Tribal governments shall be contacted immediately. Further disturbance is prohibited until permission is granted by the Executive Director of the Gorge Commission.

DATED AND SIGNED THIS 4th day of August 2010 at White Salmon, Washington.



Brian Litt
Principal Planner

EXPIRATION OF APPROVAL:

This decision of the Principal Planner becomes void on the 27th day of January, 2012.

As per Commission Rule 350-81-044(6), an extension of the validity of a development approval may be requested. Such a request shall be submitted in writing prior to the expiration of the approval. The Principal Planner may grant an extension if it is determined that conditions, for which the applicant was not responsible, would prevent the applicant from commencing the proposed development within the original time limitation. The Principal Planner shall not grant an extension if the site characteristics and/or new information indicates that the proposed use may adversely affect the scenic, cultural, natural or recreation resources in the National Scenic Area.

APPEAL PROCESS:

The appeal period ends the 3rd day of September, 2010.

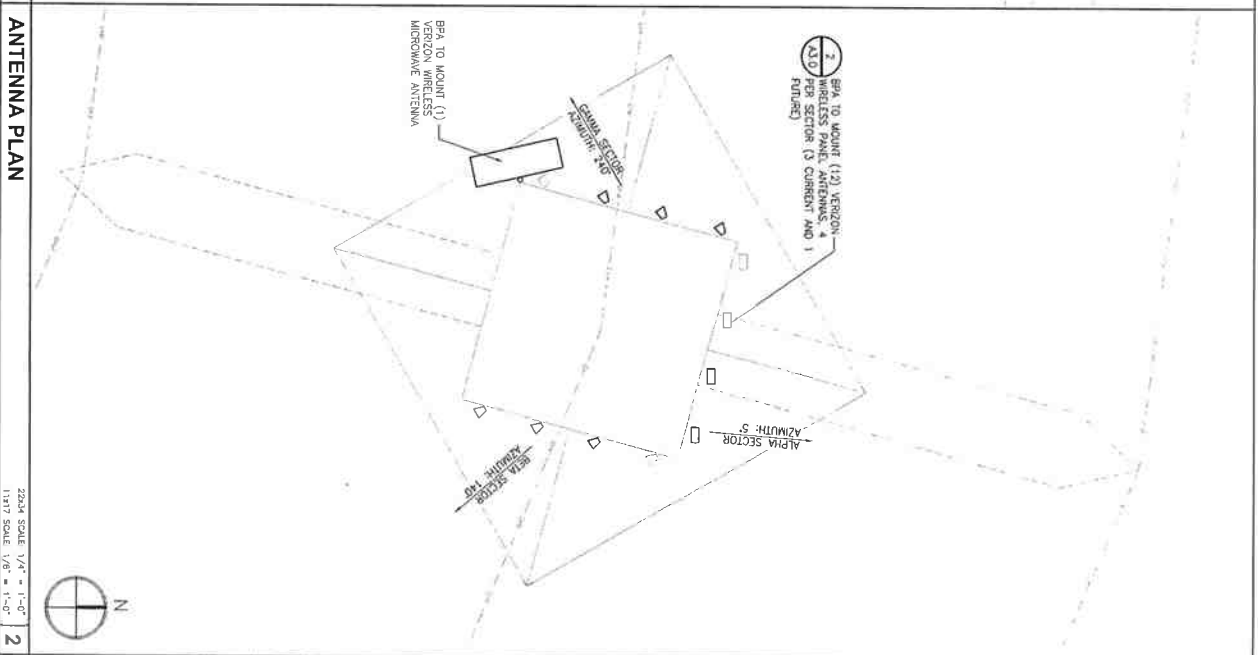
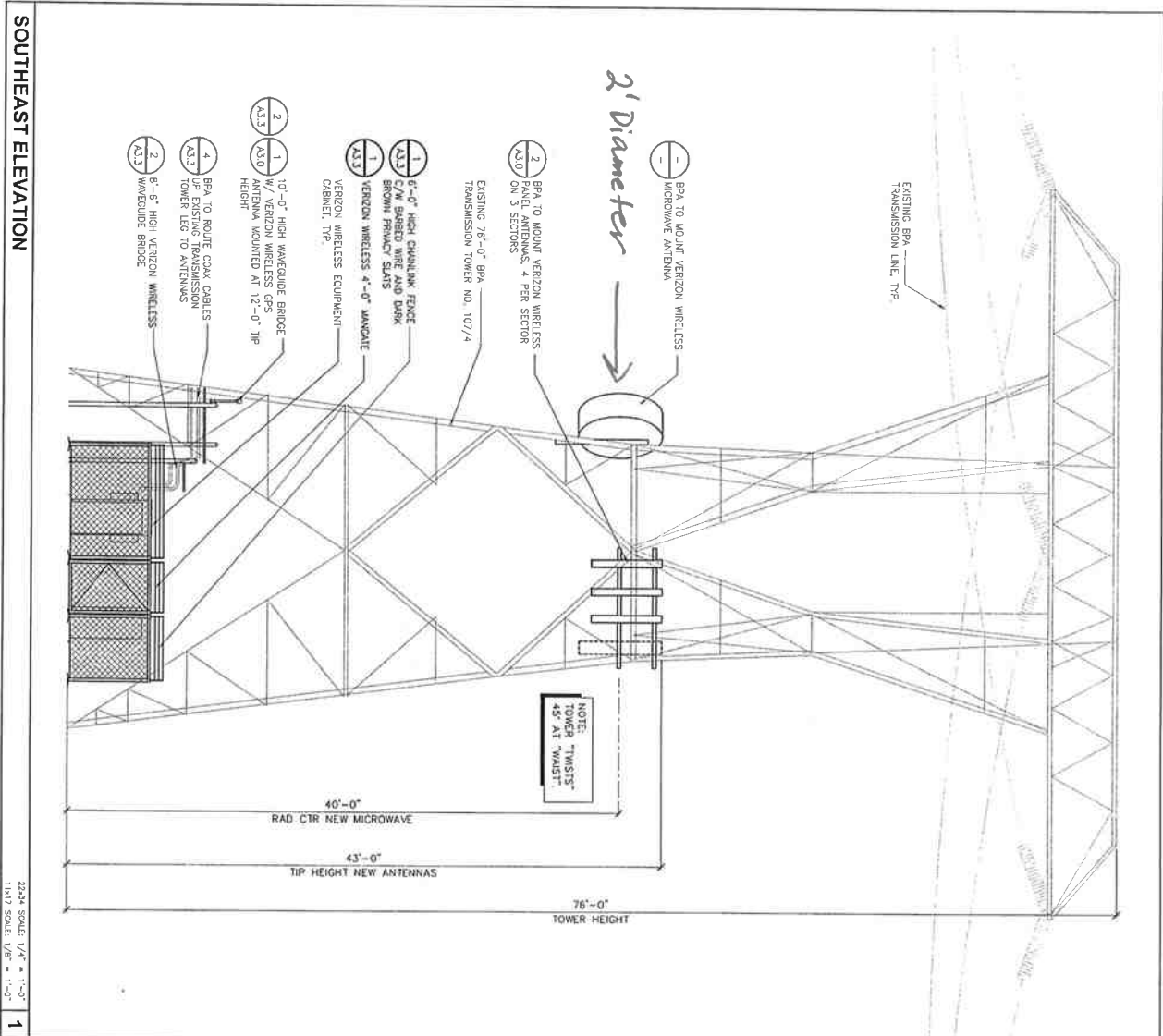
The decision of the Principal Planner shall be final unless a Notice of Intent to Appeal and Petition is filed with the Commission within thirty (30) days of the date of this decision by the applicant or any person who submitted comment. Information on the appeal process may be obtained at the Commission office.

NOTES:

Any new land uses or structural development such as residences; garages, workshops, or other accessory structures; or additions or alterations not included in the approved application or site plan will require a new application and review.

JBK
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Revised Elevation Drawing



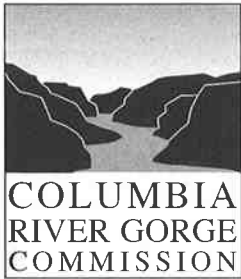
	Technology Associates 1001 Industrial Center Drive Suite 100 Rock Hill, SC 29730 Phone: 803.279.2000	2018 SW Temple Rock Hill, SC 29730 Project No. 07210 Date: 07/15/10	REGISTERED ARCHITECT REGISTERED MECHANICAL ENGINEER SALE OF CONTRACT SALE OF CONTRACT	05/06/10 05/18/10 06/30/10 07/15/10	EK EK EK EK	CD REVIEW CD REVIEW CD FINAL CD FINAL	MICROWAVE ADD
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APPROVED

8/4/10

CO9-0010
Minor change

A2.0



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MINOR CHANGE TO STAFF REPORT

APPLICANT: Verizon Wireless

LANDOWNER: Barbara Sexton

FILE NO.: C09-0010-K-G-21

ORIGINAL REQUEST:

To install a wireless communication facility with antennas on an existing BPA transmission tower, equipment cabinets in a fenced area beneath the BPA tower, and a generator on a concrete slab with a fence approximately 100 feet southeast of the tower, and to construct a gravel access road to the site.

REQUEST WITH MINOR CHANGE:

The same development as approved in the original request with additions of a microwave antenna two (2) feet in diameter located on the BPA tower, a telco cabinet adjacent to the proposed access road with two additional trees, and a service light located beneath the BPA tower. The applicant also requests to shift the location of the turnaround area 10 feet further from the BPA tower and change the color of the coaxial cables from dark grey to black.

LOCATION: The subject parcel is located at 20 Balch Road, Lyle, in the NW ¼ of Section 28, Township 3N, Range 12E, Willamette Meridian, Klickitat County, Washington. (Klickitat County Assessor's ID #03122800000600)

LAND USE

DESIGNATION: The subject parcel is in the General Management Area and is designated Small-Scale Agriculture.

COMMENTS FROM OTHER INDIVIDUALS/AGENCIES/GOVERNMENTS:

Notice of the original request was mailed to property owners within 500 feet of the subject parcel and the following individuals/agencies/governments:

Confederated Tribes and Bands of the Yakama Nation
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of Warm Springs Reservation of Oregon
Nez Perce Tribe
U.S. Forest Service National Scenic Area Office
Washington Department of Archaeology and Historic Preservation
Klickitat County Planning Department
Klickitat County Building Department
Klickitat County Health Department
Klickitat County Assessor
Washington Department of Fish and Wildlife
Washington Department of Natural Resources Natural Heritage Program
Friends of the Columbia Gorge

AMENDED FINDINGS OF FACT AND CONCLUSIONS AND ANALYSIS OF CONSISTENCY OF PROPOSED CHANGES:

All Findings and Conclusions with any changes are shown with ~~strikeout text~~ indicating deletions to the original findings and underlined text indicating additions to the original findings.

A. Land Use

1. Verizon Wireless is seeking approval to install a wireless communication facility with antennas on an existing Bonneville Power Administration (BPA) electrical transmission tower, equipment cabinets in a fenced area beneath the BPA tower, ~~and a generator on a concrete slab with a fence approximately 100 feet southeast of the tower,~~ a telco cabinet adjacent to the proposed access road, and to construct a gravel access road to the site. A similar proposal was approved in 2007 (C07-0015) but was not constructed.

The existing BPA transmission tower was installed prior to the Scenic Area Act and is 76 feet tall. Twelve panel antennas and one microwave panel (2 feet in diameter) would be installed at a height of approximately 43 feet. Four each would be installed on the north, west and east sides of the transmission tower. The equipment cabinets would be installed on a 20 foot by 10 foot concrete slab underneath the BPA tower and enclosed in a 6 foot tall chainlink fence with tan or dark brown privacy slats. Antenna cables would run from the equipment cabinets to a waveguide bridge and up a tower leg to the antennas. ~~The cables and antennas are proposed to be painted grey to match the existing BPA tower.~~ The cables would be black. A diesel generator is proposed to be installed in an 11 foot by 16.5 foot fenced compound outside the BPA easement. This fence also would be a 6 foot tall chainlink fence with dark brown privacy slats. Power will run from the generator to the equipment beneath the BPA tower through a power conduit buried in the access road. ~~No outdoor lights are~~ One outdoor service light is proposed beneath the BPA tower. The gravel access road would be 10 feet wide, approximately ¼ mile long and include a turnout at the power compound and a turnaround area at the BPA tower. A telco cabinet (approximately 48" x 48" x 10") mounted on a wood H-frame approximately 7 feet in height is proposed adjacent to the access road. The cabinet will convert copper telephone wires to fiber wires as required by BPA.

Analysis of Consistency of Proposed Change:

The applicant has proposed changes and additions to the proposed communications facility. The additional microwave panel would add telephone capacity for the site, the telco cabinet is needed to convert copper telephone wires to fiber wires as required by BPA, the light will be used during maintenance if it is dark, and the coaxial cables would be un-painted (the standard color is black). Other aspects of the project described in the original finding would remain unchanged. This finding is hereby amended to accurately describe the proposed changes to the communications facility.

3. Commission Rule 350-81-200 lists review uses on lands designated Small-Scale Agriculture allowed subject to compliance with scenic, cultural, natural and recreation resources guidelines and the additional approval criteria listed in Commission Rule 350-81-220. Commission Rule 350-81-200(1)(a) allows:

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.

The antennas, equipment, and power compound and telco cabinet constitute the proposed utility facility for transmission of communications. Radio frequency maps show that the site is necessary to provide signals along Interstate 84 and the Historic Columbia River Highway from Mosier to Rowena, most of which currently lacks any Verizon signals. The facility also will provide Verizon signals to the town of Lyle and along State Route 14. The site is necessary to provide private and public voice and data services including emergency 911 services along this corridor.

Alternative locations on other properties were not practicable based on coverage maps and local topography that blocked the intended coverage areas. Collocation of the antennas on an existing BPA tower and placement of most of the support structures within the existing BPA easement minimizes the effect on agricultural lands. Only the road and emergency power compound are outside of the BPA easement. The siting of the road follows topography to minimize grading. Adjacent lands and the subject parcel have traditionally been used for grazing and more recently for vineyards. Placement of an access road would not impede use of the parcel for grazing or use of other parcels for grazing or vineyards. After construction, these roads are infrequently used. Placement of a 200-square foot fenced power compound would remove a small amount of land from potential agricultural use. The equipment cabinets will be in a compound approximately 360 square feet in size located underneath the existing BPA tower. To the extent this area is used for grazing, it also would remove a small amount of land from agricultural use. The presence of these compounds would not deter grazing or other agricultural uses of the subject parcel or adjacent parcels. The proposed development would not adversely affect grazing or cultivation on the property or adjacent parcels. Because any alternate locations on the subject property would not utilize the existing tower - thus requiring construction of a new tower - greater adverse effects to agricultural operations could occur. There are therefore no practicable alternative locations with less adverse effects on agricultural or forest lands.

Radio frequency maps of the area show existing gaps in communications and how the proposed antennas would provide the minimum coverage for the desired target area (Interstate 84 and the Historic Columbia River Highway between Mosier and Rowena, the Lyle area and the SR 14 corridor several miles west of Lyle). This information demonstrates that the applicant has proposed the minimum number of antennas and support structures to serve the target area. The antennas have been sited halfway up the existing BPA tower in a location that minimizes visibility while reaching the necessary service area. The proposal is an allowed review use pursuant to Commission Rule 350-81-200(1)(a), subject to compliance with scenic, cultural, natural and recreation resources guidelines and the additional approval criteria listed in Commission Rule 350-81-220.

Analysis of Consistency of Proposed Change:

This finding is hereby amended to accurately describe the elements that constitute the proposed communications facility.

4. Commission Rule 350-81-220 lists additional approval criteria for specified review uses on lands designated Small-Scale Agriculture. Commission Rule 350-81-220(1) states:

The uses identified in 350-81-200, 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.*

As stated in Finding B.3 above, nearby lands and the subject parcel have traditionally been used for grazing and more recently vineyards. There are several other known communications sites located on lands adjacent to grazing operations and near vineyards elsewhere in the Gorge, some of which have been previously approved by the Gorge Commission. Empirical evidence indicates that communications facilities can occur near grazing operations or vineyards without negatively impacting these operations. The installation of a small communications facility would have no effect on grazing or other agricultural practices. Collocation of the antennas on the existing BPA tower and the location of equipment cabinets beneath the tower and telco cabinet along the road minimizes the loss of agricultural land. The two fenced enclosures for the generator and equipment are small and would remove minimal amounts of land from potential grazing. The road has been designed to access the site in as short a distance as possible while maintaining a reasonable road grade. The proposal is consistent with Commission Rule 350-81-220(1).

Analysis of Consistency of Proposed Change:

This finding is hereby amended to accurately describe the elements that constitute the proposed communications facility. Given the small size of the telco cabinet and its location along the road, adding it to the project will not materially impact the loss of agricultural land as originally analyzed. The finding continues to support the conclusion that the project will be consistent with Commission Rule 350-81-220(1).

B. Scenic Resources

5. Commission Rule 350-81-520(2)(c) states:

Determination of potential visual effects and compliance with visual subordination policies shall include consideration of the cumulative effects of proposed developments.

The key viewing areas from which this development is visible are between 1.8 and 5.8 miles distant. The antennas are small and have been sited on an existing tower in a manner that blends them into the tower. The associated equipment cabinets will be located beneath the tower and screened by a chainlink fence with privacy slats. The proposed power compound is less than 200 square feet and sited such that it will be in front of the tower as seen from some key viewing areas. This will help it blend in with the existing structure in these areas. In addition, the fence for the power compound will use dark earth-tone colors for the privacy slats and a condition of approval will require two coniferous trees to be planted to further screen this structure and the fill slope and achieve year-round visual subordination from key viewing areas. The road has been sited generally along topographic lines and it minimizes topography-altering grading.

The telco cabinet has been sited along the access road and two coniferous trees will be planted to screen this small structure from the existing nearby dwelling. Other developments at a distance from key viewing areas, similarly sited, designed and conditioned would not cause adverse scenic impacts. The proposed development would not generate adverse cumulative scenic impacts.

Analysis of Consistency of Proposed Change:

A microwave antenna and telco cabinet will be added to the original project. Given the small size of the microwave antenna (2' diameter) and its location on the existing BPA tower and the small size of the telco cabinet located along the access road, these additions will not affect the cumulative scenic impacts of the proposed development. The finding supports the conclusion that the project will be consistent with Commission Rule 350-81-520(2)(c).

8. Commission Rule 350-81-520(2)(e) states:

New development shall be sited to achieve visual subordination from key viewing areas, unless the siting would place such development in a buffer specified for protection of wetlands, riparian corridors, sensitive plants, or sensitive wildlife sites or would conflict with guidelines to protect cultural resources. In such situations, development shall comply with this guideline to the maximum extent practicable.

The existing tower is partially visible from four linear key viewing areas and fully visible from the Rowena Plateau and Nature Conservancy Viewpoint. The base of the tower is mostly screened by topography and off-site vegetation from lower elevation key viewing areas, portions of linear key viewing closest to the site, and as viewed from the west. Therefore, the equipment cabinets, power compound and road are not fully visible from all portions of all key viewing areas. The equipment cabinets have been sited beneath an existing BPA tower which minimizes the number of structures in the landscape and the antennas are located about halfway up an existing tower to blend with the tower. The power compound is sited behind existing topography to screen it from the closest portions of key viewing areas and the lower elevation key viewing areas (e.g. Interstate 84 and the Columbia River) and such that it is in front of the tower as seen from more distant key viewing areas (portions of the HRCH and the Rowena Plateau). It is sited along the proposed access road so a separate road is not necessary. The access road has been sited to extend from an existing driveway and follow the existing topography without the need for cut banks. Siting the road closer to existing vegetation to the south would have required the road to then traverse a steeper slope up to the tower and would have likely required cut banks. The telco cabinet is sited along the proposed access road and near an existing PUD power pole which will help cluster it with other structures. These siting choices, in combination with the distance to key viewing areas, ensures that the proposal will be visually subordinate as seen from key viewing areas. A condition of approval shall require the development to be constructed as proposed and shown on the approved site plan. With this condition, the proposal is consistent with Commission Rule 350-81-520(2)(e).

Analysis of Consistency of Proposed Change:

This finding is hereby amended to include all of the elements that constitute the proposed communications facility. Given the small size of the telco cabinet and its location along the proposed road, the project is still sited such that it will be visually subordinate as seen from key viewing areas. The finding continues to support the conclusion that the project will be consistent

with Commission Rule 350-81-520(2)(e).

11. Commission Rule 350-81-520(2)(j) lists guidelines that apply to new landscaping used to screen development from key viewing areas. Commission Rule 350-81-520(2)(j)(A) states:

New landscaping (including new earth berms) shall be required only when application of all other available guidelines in 350-81-520 is not sufficient to make the development visually subordinate from key viewing areas. Alternate sites shall be considered prior to using new landscaping to achieve visual subordination. Development shall be sited to avoid the need for new landscaping wherever possible.

The placement of the antennas in the middle of an existing BPA tower allows them to blend with the existing tower. This siting, the small size of the antennas, and distance to key viewing areas will make them visually subordinate from key viewing areas. No new landscaping is required for the antennas. Similarly, the equipment cabinets are sited beneath the existing tower. The base of the tower is screened by topography and off-site vegetation from some key viewing areas. This siting will make it visually subordinate from lower elevation key viewing areas without any new landscaping. For higher elevation key viewing areas (Rowena Plateau and portions of the HRCH), distance from the key viewing areas along with the use of dark colors for the fence, will make it visually subordinate.

The power compound would be sited in a grassy area, but the fenced area is small (less than 200 square feet and only 6 feet tall) and will be dark earth-tone colors. These elements, in addition to the distance to key viewing areas, will help them blend with the landscape as seen from key viewing areas. And from some vantage points, the existing tower will be the immediate backdrop, which will help it blend with existing development. There also is existing vegetation on adjacent properties that will screen the compound from lower elevation key viewing areas. However, there is no existing screening vegetation on the subject parcel that would screen the power compound from portions of the HRCH and the Rowena Plateau. A 4 foot high fill slope, about 30 feet in width, will be used for the location of the power compound. Because there is no adjacent vegetation screening this small compound and it requires some fill, two coniferous trees planted to the south this structure will ensure it will achieve visual subordination from all key viewing areas.

The telco cabinet is sited along the access road in an area that is screened by topography and existing vegetation from lower elevation key viewing areas. For higher elevation key viewing areas, distance from the key viewing areas along with the use of dark colors will make it visually subordinate. The applicant proposes to plant two coniferous trees on the east side of the telco cabinet to screen it from the nearby existing dwelling. The trees are not necessary to ensure the cabinet is visually subordinate from key viewing areas.

The gravel access road will extend from an existing driveway and traverse an open grassy area. There are no trees to screen the proposed road from the Rowena Plateau and portions of the HRCH. However, because the road is designed to follow the existing topography and avoid cut banks, and due to the distance from those key viewing areas, it will be visually subordinate without new landscaping. The siting of the road avoids the need for new landscaping.

No alternative sites would better achieve overall visual subordination for the entire project. The siting of the antennas achieves visual subordination and meets other siting objectives in these rules (collocation on existing towers); the support structures must be sited near the antennas; the telco cabinet is sited near the access road; and the access road extends from an existing driveway and follows existing topography without cut banks. The proposal is consistent with Commission Rule 350-81-520(2)(j)(A).

Analysis of Consistency of Proposed Change:

A microwave antenna and telco cabinet will be added to the original project. The siting, size, and required use of dark colors for these elements do not affect the amount of new landscaping required to ensure the overall project is visually subordinate from key viewing areas. The finding supports the conclusion that the project will be consistent with Commission Rule 350-81-520(2)(j)(A).

14. Commission Rule 350-81-520(2)(l) states:

Unless expressly exempted by other provisions in 350-81-520, 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 applicant has proposed that the antennas ~~and cables~~ attached to the existing BPA tower be painted grey to match and blend with the tower. Because the tower is an existing structure, a grey color for these elements will ensure they do not contrast from the existing structure and, therefore, will not be visible from distant key viewing areas. To be consistent with Commission Rule 350-81-520(2)(l) the grey needs to be dark. A condition of approval will require the antennas ~~and cables~~ to be painted a dark grey color. Black is the standard color for the cables that will run from equipment cabinets to the antennas. Given the size of the cables and the distance of the site from key viewing areas, there is no need to alter the black color to ensure they are visually subordinate from key viewing areas. They will be virtually invisible from key viewing areas. For the fence enclosing the equipment cabinets beneath the tower, the applicant proposes to use tan or dark brown privacy slats in a chainlink fence. Dark brown privacy slats are proposed for the fence around the power compound. Given the dark colors in the hillside and nearby trees, the dark brown color will best meet this guideline. A condition of approval will require the use of dark brown privacy slats for both fences. The privacy slats will hide the interior of the power and equipment compounds from key viewing areas. A condition also will require the equipment cabinets, ~~and power generator, and telco cabinet~~ to be painted a dark brown color to ensure they are visually subordinate as seen from higher elevation key viewing areas. As conditioned, these colors are consistent with Commission Rule 350-81-520(2)(l).

Analysis of Consistency of Proposed Change:

This finding is hereby amended to include the telco cabinet so it can be included in the elements to be painted dark brown to ensure it is visually subordinate from key viewing areas. This finding is also changed to respond to the applicant's request that the cables not be painted. Leaving the cables the standard black color does not affect the visual subordination of the project. The revised finding supports the conclusion that the project will be consistent with Commission Rule 350-81-

520(2)(l).

16. Commission Rule 350-81-520(2)(p) states:

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.

~~No exterior light is proposed. One task light to be used during maintenance is proposed in the equipment compound under the BPA tower. As shown on sheet A3.2, the task light is not directed downward. The shielding and hooding materials were not provided. A condition of approval will alert the applicant to these requirements and that any future exterior lighting must be reviewed. As conditioned, the proposal is consistent with Commission Rule 350-81-520(2)(p).~~

Analysis of Consistency of Proposed Change:

The original proposal did not include exterior lighting. A task light is now proposed within the equipment compound under the BPA tower. This finding is hereby amended to reflect the addition of a task light. With an amended condition to require the proposed task light to be directed downward and shielded with non-reflective, opaque materials, the project remains consistent with Commission Rule 350-81-520(2)(p).

23. Commission Rule 350-81-520(3)(a)(A) states:

Accessory structures, outbuildings, and access ways shall be clustered together as much as possible, particularly towards the edges of existing meadows, pastures, and farm fields.

The equipment cabinets are sited beneath an existing structure, and the power compound will be located so it is clustered near the existing tower, and the telco cabinet will be located along the proposed road and not far from the existing dwelling and an existing PUD power pole toward the edge of the field. For as much of its length as possible, the access way has been sited toward the edge of the field. As described in Finding B.8, if the road were sited along the edge of the field to the south for a greater distance, it would have resulted in greater grading impacts. The siting is consistent with Commission Rule 350-81-520(3)(a)(A).

Analysis of Consistency of Proposed Change:

This finding is hereby amended to include the addition of a telco cabinet. Adding the telco cabinet will not affect the consistency of the project with Commission Rule 350-81-520(3)(a)(A) because it is located toward the edge of the field and clustered with the proposed road, existing PUD power pole, and existing dwelling.

C. Cultural Resources

1. Commission Rules 350-81-540(1)(c)(A) and (B) include guidelines to determine when a cultural resource reconnaissance survey and a historic survey are required. In 2007, Margaret Dryden, U.S. Forest Service Archaeologist, reviewed the proposed use pursuant to these rules and determined that the proposed use required a reconnaissance survey but did not require a historic survey. Pursuant to Commission Rule 350-81-540(1)(c)(C), the

applicant provided a survey because it was determined the communications facility qualifies as a large-scale use. Commission staff and Ms. Dryden reviewed the 2007 reconnaissance survey prepared by Ben Ludwig, Archaeologist with Tetra Tech EC and determined the survey was sufficient for this proposal (per phone conversation on 9/22/09 and subsequently by letter dated 12/9/09 and email dated 7/12/10).

Analysis of Consistency of Proposed Change:

Staff confirmed with US Forest Service Archaeologist Margaret Dryden that the proposed addition of the telco cabinet did not require any additional cultural resource survey work. Ms. Dryden provided this confirmation by email on July 12, 2010. This finding is hereby amended to reflect the recent Commission staff contact with Ms. Dryden.

cc: Confederated Tribes and Bands of the Yakama Indian Nation
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of Warm Springs Reservation
Nez Perce Tribe
Klickitat County Planning
Klickitat County Building
Friends of the Columbia Gorge
Washington Department of Archaeology and Historic Preservation
Washington Department of Fish and Wildlife
Washington Natural Heritage Program
Marc Dinnerstein

JBK
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