

## Marys Peak BPA Communications Project Scoping Comment Summary

BPA held two scoping periods for the Project:

- September 27, 2016, to December 2, 2016 (initial public meeting November 9, 2016)
- January 8, 2018, to February 21, 2018 (additional public meeting January 25, 2018)

Comments received during the scoping comment periods, both written and verbal, are posted on the Project website (<https://www.bpa.gov/goto/maryspeak>). BPA received comments about a wide range of topics for consideration, questions, and information on the Project area. Comments from both scoping periods are summarized below.

Comments received during both comment periods focused mainly on the Marys Peak communications site. Comments received on the BPA Prospect Hill communications site include the request that BPA use Prospect Hill instead of the BPA Albany Substation because it is located in a less populated area. Another person noted that the use of Prospect Hill site would not require the removal of any trees at Prospect Hill.

A request was made to avoid using the BPA Albany Substation because of the proximity of the Project to neighborhoods which could decrease property values and also because of concerns about potential health effects. Questions were asked about communications structures at or near the Albany Substation. A request was made for an explanation of which site would be better, the Albany Substation or Prospect Hill, from BPA's and the Department of Energy's perspective.

Many comments emphasized the importance and value of Marys Peak to the local community and to visitors due to the high quality and unique resources, including botanical, wildlife, ecological, geological, visual, aesthetic, cultural, spiritual, educational, and recreational resources. Others commented on the value of Marys Peak as a communications site (BPA site and/or USFS site) due to the 360 degree unobstructed view from the peak, emphasizing that Marys Peak serves as a critical component of the regional emergency and non-emergency communications infrastructure for federal and state agencies, local governments, private companies, and amateur radio groups. While some people are concerned that the summit communications site is and will continue to be harmful to the scenic beauty, tranquility, and natural plant communities on Marys Peak, others are concerned that moving communications facilities off the summit would provide less effective communications.

Commenters asked questions and provided information on the **history and use of the site**, including:

- Request that the Environmental Assessment (EA) include an accurate history of the land use and ownership of the summit communications site, including why BPA and USFS have a communications site on Marys Peak
- Historical information on Marys Peak, including road construction by the Civilian Conservation Corps and the terms of the city conveyance of the property to the USFS
- The USFS Management Plans, including those that addressed the designated Scenic Botanical Special Interest Area at Marys Peak
- The current use of the site as a communications site including which entities use the site and the financial arrangements, and if this Project would include for-profit use of any new communications structures

- Concerns about the existing fence around the summit communications site, that it is unattractive, larger than needed, ineffective as a deterrent to vandals, and results in negative impacts to vegetation; commenters requested a reduction in the size of the area within the fence

**Questions were asked about the Project, including:**

- The agencies involved and their roles and responsibilities, such as how USFS will decide whether or not to authorize BPA site improvements, and why BLM is a cooperating agency on this project
- Why a full EA or Environmental Impact Statement process is needed for a maintenance action and why the process is taking so long, costing money
- Requests for a strong public involvement process with active public participation
- Requests for more information on the amount of funding for the project, including whether BPA would fund weed control at Marys Peak and West Point Spur and road maintenance at West Point Spur
- Questions about the schedule and why the process is taking a long time
- Question on whether specialists would write reports that would provide the information used in the EA
- Specific questions on project design such as structure heights, type of equipment, type of building upgrade, and noise level of new equipment
- Questions on the type, location, and amount of construction disturbance, including access road work, if any areas would be paved, amount of excavation and fill, the type of machinery and materials used, description of each activity, and erosion control measures that would be implemented
- If access road work drainage structures would be installed that could result in off-road impacts
- If any chemicals would be used on the Project
- Questions on the type of restoration that would be done to areas disturbed from construction, including inside and outside the fence
- Involvement of USFS staff in construction, whether they will be on site, and notification and communication procedures during construction.

Many concerns and suggestions were received on **Project alternatives**, including:

- Suggestion that BPA consider the entire communication network and look at a network strategy rather than taking a project-by-project approach in the EA
- Concern that the Marys Peak summit is not an appropriate location for a communications site due to the remote location, extreme temperatures, high winds, number of visitors, and security issues and therefore BPA should consider moving the communications site to a different location
- Suggestions for project alternatives include: remain at the site, consolidate BPA and USFS communication facilities on Marys Peak, or relocate the site further downslope or off Marys Peak, including specific locations that could be considered
- Request to reduce the size of the fenced area at the communications site for several reasons, including less impact to natural resources, to improve the experience of visitors, and there would be a larger area for paragliders to launch from the summit
- Request to consolidate the BPA and USFS communications structure with an observation structure for use by the public (detailed plans were provided for this alternative) that would be more secure (earthquakes and vandals) and eliminate the need for the fence; it could be funded from a variety of sources, public and private

- Suggestion to put the communications buildings underground and move the communications structures downslope to allow a 360 degree view
- Request that BPA avoid residential areas and another request that BPA should build a communications structure near a residential area
- Suggestion that a contest be to solicit designs that would be more visually pleasing
- Statement that this project is an opportunity to follow the SNF planning documents, including the USFS Marys Peak Management Plan, that the plans should be used to eliminate alternatives that do not comply, such as consolidation of facilities, and the Project should emphasize scenic and botanical resources rather than communications uses; request to not choose an alternative that requires a management plan amendment
- Suggestions that BPA relocate the communications site to West Point Spur site because it is more secure, is outside the USFS Special Interest Area, and would decrease visual impacts; request that BPA collocate with a current user rather than building a new communications facility
- Concern that use of lower elevation communication sites would not likely match the VHF/UHF coverage currently provided by the summit of Marys Peak
- Request that alternatives be developed using a range of technologies, including cell phone coverage, satellite coverage, repeater site coverage instead of VHF radio

Comments regarded **resources to consider** in the EA analysis, information about the **potential impacts to each resource** from each alternative, and suggested **mitigation measures to avoid or minimize impacts** to each resource, as described below.

Information was provided on the types of **land use and recreation** at Marys Peak including summer and winter outdoor recreation such as hiking, hang gliding, paragliding, sledding, and skiing. Recreational users described a deep personal connection and long history enjoying Marys Peak and stated that the presence at the communications site degrades their recreational experiences. For some, Marys Peak provides a place of personal renewal, to enjoy some solitude, meditate, promote spiritual rejuvenation, and to enjoy the clean mountain air. Volunteers provide interpretive services to educate the general public who visit Marys Peak and others come to study resources such as the unique plant life. Concern was expressed that existing land uses would be impacted during construction, including use of the public parking lot and public access to the summit of Marys Peak, and if so, when and for how long.

One commenter requested that interpretive signage be constructed in a style that complements the nature and history of the Peak but another commenter did not think signage was a good idea due to vandalism and damage from exposure to the elements. A commenter requested the presence of rangers during and after construction that could explain the Project and how impacts were minimized. Requests were received for a construction timeframe that minimizes disturbance to human visitors.

A comment related to **socioeconomics** pointed out that visitors to Marys Peak boost the local economy due to their spending for services and supplies in nearby towns and cities.

Commenters concerned about **visual resources** pointed out that the panoramic view from Mary Peak is exceptional and they would like the communications site removed to provide a 360 degree view. There was concern expressed that the existing communications site has negatively impacted visual resources and the proposed Project would continue or increase impacts. There were concerns about the addition of equipment resulting in an increase in visible clutter and questions about how visible any new

equipment would be from the parking lot and hiking trails. Suggested measures to minimize Project impacts include removing the communications site or designing and constructing the Project in a way that minimizes the visual impact. Concerns were expressed about forest thinning at West Point Spur and how that could affect the enjoyment of Marys Peak by recreational users.

Suggestions to minimize impacts to visual resources include using a small number of relatively short communication structures instead of tall communications structures, installing new equipment as low as possible on the new communications structure, and painting communications poles a dark color rather than using white paint or shiny metal, using a cameo paint finish that would blend better with the natural environment, and disguising antennas such as the way cell towers are disguised as trees.

Most comments related to **soils** regarded the need for erosion control except for a comment on the Mulkey soil type at the [Marys Peak] summit that stated this soil type is unique and the soil removed to excavate the foundation of the new building should be used to fill in the holes. It was stated that paving and spills of petroleum products must be avoided to protect soils.

There were numerous statements that the subalpine **vegetation** at the summit of Marys Peak is very unique and very diverse, including some rare plant species, some species that do not grow in other places in western Oregon, a beautiful wildflower display that attracts many visitors, and a very unusual high-elevation meadow community and noble fir forest. A commenter stated that the Scenic Botanical Special Interest Area designation is the highest level of protection the USFS can establish. Concerns were expressed about impacts to vegetation and plant communities from various Project activities, including road work that impacts the area adjacent to the road, such as side-casting and water barring. Requests were made to establish a goal of minimal disturbance to the native plant communities because fragile plant communities do not recover well from disturbance. Suggestions to minimize impacts include choosing the construction period at that time that minimizes harm to plants, creating designated walking paths on the summit, avoiding paving and spills of petroleum products, reintroduce a rare violet that used to grow at the summit and is no longer known to be present, and using native plant species from the summit area for restoration of the areas disturbed by Project construction.

Concerns were expressed about **weeds** (non-native and invasive plant species) that could be introduced or spread by Project construction, including access road work that affects vegetation along roads. Information was provided on weeds that already exist on Marys Peak and a request was made for a weed survey at West Point Spur prior to construction. There was a request for a work party to remove weeds that currently grow inside the communications site fence because that could spread outside the fence. Commenters were concerned about how weeds would be controlled in the future. Suggestions were provided on measures to control weeds, including using weed-free materials, avoiding the use of bales of straw, grass, or hay, and cleaning of equipment and vehicles prior to entering work areas.

Commenters stated that a diversity of **wildlife**, including birds and insects that live near the summit, need to be protected from Project impacts. Concerns were expressed about the effect of new communications equipment on wildlife, including the effect of noise and **electromagnetic frequency (EMF) radiation** on navigation and hunting. Suggestions were provided on specific best management practices to avoid or minimize impacts, including work timing restrictions and use of erosion control that does not harm wildlife.

Commenters asked questions about **cultural resources**, including the level of cultural identification efforts during Project cultural surveys, if we have consulted with tribes and if Tribes have been asked if

they wish to be cooperating agencies. Concerns were expressed about potential damage to cultural resources and the mountain as a tribal traditional cultural property (spiritual place and resource gathering area). A request was made that all excavation be monitored by a cultural specialist to discover buried historic or prehistoric materials and that the U.S. National Geodetic Survey “Marys 1903” benchmark embedded at the summit not be removed during construction.

Concerns were expressed that **noise** from equipment such as heating, cooling, and fans, would be heard at the summit and all the way down to the public parking lot. The commenter stated that fan noise from the summit can be heard at the public parking lot. Concerns were expressed that noise from equipment at West Point Spur would be heard at the campground, along trails, and at the summit. To mitigate for noise, a commenter asked if some sort of noise baffle could be made to cover noise generated at the facility.

Concerns were expressed about **public health and safety**, including the potential for construction would increase fire danger, that equipment could be hit by lightning, whether the Project would result in an increase in noise pollution or electromagnetic frequency radiation, and if the Project could affect Federal Aviation Administration’s communication equipment at Marys Peak. Concerns were raised if an increase of EMF or microwave strength would damage the health of people in the vicinity of the signal and a request was made to not use a communications site near a residential area, to avoid impacts to health and a decrease in property values.

A commenter stated that the security and operational capability of the power grid directly affects everyone. There were requests for BPA to enhance the site with more seismic and weather resistance and physical security, and better electrical power reliability at the site. Others expressed concerns that the communications site is inherently insecure and unreliable due to the large number of visitors and the harsh winter conditions. Concerns were raised about a detrimental effect of leaving Marys Peak on emergency services, including

There were numerous comments by agencies and individuals expressing concern about BPA facilities moving off Marys Peak because of the effect on public services. Commenters stated that Mary Peak is essential their emergency services, including emergency responders and 911 services and that maintaining emergency services should be the first concern of the Project. While commenters stated they understood that the BPA facilities only serves BPA’s emergency needs, their concern is other users at the USFS communications site will be pressured to leave Marys Peak if BPA leaves.

A question was asked if the project would increase or decrease **greenhouse gas emissions**.

Questions were received on the **agency decision**, for the Project, whether only one agency (BPA, USFS, or BLM) will make the final decision on the Project or if all agencies make their own decision based on their agency action. A question was asked on the evaluation criteria that will be used to make the decision. It was suggested that the decision be based on what experts consider the best situation, rather than choosing the most or the least expensive alternative.