

**SUPPLEMENTAL ANALYSIS TO THE ENVIRONMENTAL ASSESSMENT  
GALENA SUMMIT COMMUNICATION PROJECT  
Formal 30-Day Opportunity to Comment  
February 2009**

**COMMENTS WELCOME**

The Sawtooth National Forest welcomes your comments on the proposal to make a non-significant amendment to the Forest Plan. The proposed amendment was evaluated in the July 2008 Environmental Assessment for the Galena Summit Communication Project (EA), and is further described below. The need for the proposed amendment was identified as we were completing our analysis of the proposed authorization for the Galena Summit Communications Project, more commonly known as the Galena cell tower project. The Forest is now seeking public comment specific to the proposal to prepare a non-significant amendment to the Forest Plan.

**BACKGROUND**

The Sawtooth National Forest received a proposal in 2003 from Idaho Tower Company to construct a wireless telecommunications facility (cell tower and support building) on Galena Summit. The July 2008 Galena Summit Communication Project EA was prepared, in compliance with National Environmental Policy Act (NEPA), to address this proposal. Through the environmental assessment process, the Forest identified the need for a non-significant amendment to the Forest Plan Visual Quality Objectives (VQO) map to address changes in use that have been identified in the cell tower project area since the Forest Plan was revised.

On July 10, 2008, the Sawtooth Forest Supervisor signed a Decision Notice and Finding of No Significant Impact (DN/FONSI) for the Galena Summit Communications Project. The decision selected the “No Action” alternative – which did not permit construction of the proposed cell tower, and approved the non-significant amendment to the Forest Plan VQO map. The decision was subsequently appealed. On September 30, 2008, the Appeal Deciding Officer (ADO) issued a final appeal decision regarding the decision. In her letter, the ADO stated:

“I am reversing the decision by Sawtooth Forest Supervisor Jane Kollmeyer. The record provided by the Forest Supervisor does not contain sufficient information to demonstrate that there was adequate notice and opportunity for public comment on the proposal to amend the Forest Plan to change Visual Quality Objectives (VQO) for the project area. Following reconsideration of the Forest Plan amendment, the Forest Supervisor shall determine the appropriate response to the special use permit application filed by Idaho Tower Company.”

The July 2008 Galena Summit Communication Project EA and DN/FONSI, as well as the final Appeal Decision letters (Sept. 30, 2008), can be found on the Sawtooth Forest internet site at: <http://www.fs.fed.us/r4/sawtooth/projects/> .

Through this formal 30-day notice and comment period, the Sawtooth Forest is providing an opportunity for public comment on the proposal to make a non-significant amendment to the Forest Plan VQO map.

## **SCOPE OF THE ANALYSIS**

The Forest Supervisor, with the help of an interdisciplinary team, reviewed the final Appeal Decision, the Galena Summit Communications Project EA and administrative record, the 2003 Sawtooth Forest Land & Resource Management Plan (Forest Plan), and Forest Service regulations to determine what supplemental analysis was necessary to address the deficiencies identified by the ADO. Through this review, it was determined that the scope of the supplemental analysis is to provide additional analysis specific to the proposal described in the July 2008 EA to make a non-significant amendment to the Forest Plan VQO map for the Galena Summit area. This supplemental analysis does not change any other issues or analyses disclosed in the July 2008 EA. All other aspects of the proposed action for the Galena Summit Communication project remain unchanged. The proposed action is found in the July 2008 Galena Summit Communications EA on pp. 1 and 9-15.

After completion of the supplemental analysis, the Forest Supervisor will issue a decision on the proposed non-significant Forest Plan amendment and the proposed Galena Communications Site (Cell Tower) project.

## **PROPOSAL TO AMEND THE FOREST PLAN VQO MAP**

The 2003 Forest Plan included direction specific to the management of scenic quality and the scenic environment. This direction was developed using the Visual Management System (VMS). The VMS provides criteria for identification and classification of scenic quality and is based on the concept that a natural-appearing landscape character is preferred. The VMS requires the determination of Visual Quality Objectives (VQOs) for all areas within the National Forests. VQOs represent categories of acceptable alteration to the landscape measured in degrees of deviation from the natural-appearing landscape. There are five established classes of VQOs: Preservation; Retention; Partial Retention; Modification; and Maximum Modification. More details regarding the Visual Management System can be found in Chapter 1, The Visual Management System of Volume 2, National Forest Landscape Management (USDA Forest Service 1974).

Using the VMS, the entire Sawtooth National Forest was inventoried in the early 1980's and recommended VQOs were mapped. A broad-scale review of the Forest VQO map was completed during the 2003 Forest Plan revision process. No modifications to the Forest VQOs were made during this review. An assumption that is inherent in the application of the VMS is that VQOs may be modified (higher or lower) over time as uses and conditions on the ground change. As such, the VMS provides for the review of assigned VQOs during site-specific, project level analysis. Where it is determined that a change to the Forest VQO map is necessary, this change must be documented in an amendment to the Forest Plan.

Through the Galena Summit Communications Project environmental assessment process, the Forest determined that changes in use have occurred in the cell tower project area. Given the

apparent change in use, the Sawtooth National Forest proposes to make a non-significant Forest Plan amendment to:

Change the adopted VQO from Partial Retention to Retention in the foreground of Forest Road (FR) 70405, which in the winter is commonly referred to as the skier's 'skin track'<sup>1</sup>. This change will be affected by implementing a non-significant Forest Plan amendment to the adopted VQO map on which management direction related to visual resources in the Forest Plan is based. The primary driver for the proposal to change the adopted VQO is an apparent change in use levels on FR 70405 since VQOs were originally mapped in the 1970's. Therefore, analysis of the proposal to change the VQO will include:

- Determination as to whether or not use levels on FR 70405, a.k.a. the skier's 'skin track' have increased to the degree that would warrant identification of the road as a Primary travel route with a viewer sensitivity level 1; and
- Identification of any other travel routes to be used in the scenic evaluation.

All other aspects of the proposed action for the Galena Summit Communication project remain unchanged.

## **ADDITIONAL INFORMATION FOR THE PROPOSED NON-SIGNIFICANT AMENDMENT**

### **FR 70405 (skier's skin track) - Designation as a 'Primary Travel Route with a viewer sensitivity level 1'**

When scenic resources are a key issue to be analyzed, disclosing the 'sensitive travel routes' to be used for the scenic evaluation is important. It is from these routes, and/or other sensitive viewing points, that the analysis of the effects on the visual resource is analyzed. There is a considerable difference in potential visual effects of the proposed cell tower as viewed from State Highway 75 as contrasted with those from FR 70405.

FR 70405 was not identified as a sensitive travel route when VQO's were mapped and inventoried in the 1970's. Since that time, the route has experienced an increase in importance for recreation use, especially in winter. It is now estimated that winter use of the road exceeds 3500 users per season.

The *VISUAL MANAGEMENT SYSTEM for the Sawtooth National Forest* (VMS) includes provisions for determination of sensitive travel routes used for scenic evaluation. Specifically, VMS states that "trails, snowmobile routes, and cross country ski routes with greater than 500 users per season" are identified as primary travel routes. Recreational use of FR 70405 has increased over the years. This was disclosed and discussed in detail in the Galena Summit Communications (cell tower) EA. Following the process prescribed on pages 17 and 18 of the publication *VISUAL MANAGEMENT SYSTEM for the Sawtooth National Forest*, FR 70405 was

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<sup>1</sup> "Skin Track" is a term commonly used by backcountry skiers. Backcountry skiers often use climbing skins on the bottom of their skis when traveling uphill so that the ski will glide forward but not slide backwards when weighted. Skins are removable pieces of plush fabric. The backcountry skier will leave 'skin tracks' that look like trails in the snow as they head up a snowy mountain. In areas frequently used by backcountry skiers, a skin track will be set early in the winter season and maintained all winter long by skiers using it.

determined in the EA to be a Primary travel route (i.e. a cross-country ski route with greater than 500 users per season) with a ‘viewer sensitivity level 1’ (i.e. at least ¼ of the users have a major concern for scenic quality).

**PUBLIC COMMENT ON THIS DETERMINATION:** The Forest Service has determined that use levels on Forest Road 70405 have increased to a level that warrants identification of FR 70405 as a ‘primary travel route with a viewer sensitivity level 1’. (i.e.: Greater than 500 users per season). Are there other travel routes in the area that should be reassessed to determine if they qualify as primary travel routes and/or to determine their appropriate viewer sensitivity level?

**Forest Road 70405 (skier’s skin track) – Change the adopted VQO as viewed from Forest Road 70405 to foreground Retention (R). (Note: The area adjacent to FR 70405 is currently mapped as middleground Partial Retention (PR), as viewed from State Highway 75).**

An assumption that is inherent in the application of the VMS is that VQOs may be modified (higher or lower) over time as uses and conditions on the ground change. These changes may be necessary due to changes in recreational use patterns, and/or through the development of forest management activities. Because the VQOs were mapped and/or inventoried at a Forest-wide level, it is expected that during any project level assessment that modifications may be made to the mapped inventory data to best reflect on-the-ground conditions (*Visual Management System for the Sawtooth National Forest, p. 31, circa 1986*).

As noted above, use of the area has increased since the VQOs were originally inventoried. Following the process prescribed on pages 22 and 23 of the publication *VISUAL MANAGEMENT SYSTEM for the Sawtooth National Forest*, the appropriate VQO for FR 70405 was determined in the EA to be a Foreground Retention (R).

**PUBLIC COMMENT ON THIS PROPOSAL:** The Forest proposes to change the adopted VQO for FR 70405 to Retention, resulting in a non-significant Forest Plan amendment to the Forest Plan VQO Map.

As described in the scope of analysis, after completion of the supplemental analysis described above, a new decision for this project will be issued.

## **COMMENT PROCESS**

Written, facsimile, hand-delivered, oral, and electronic comments concerning this action will be accepted for 30 calendar days following the publication of the Legal Notice in the Times-News newspaper. The publication date in the newspaper of record is the exclusive means for calculating the comment period for this analysis. Those wishing to comment should not rely upon dates or timeframe information provided by any other source. The regulations prohibit extending the length of the comment period. Only those who submit timely comments will have eligibility to appeal the decision. Those individuals and organizations that commented during the last 30-day notice for this project (April 19 – May 21, 2007) do not need to re-submit their comments in order to retain their eligibility to appeal. We will consider their original comments

for this current comment period. For those individuals and organizations that did not comment previously, and wishing to be eligible to appeal, or to anyone submitting additional comments, they must provide the following information:

1. Name and Address;
2. Title of the proposed action;
3. Specific comments (36 CFR 215.2) on the proposed action, along with supporting reasons that the Responsible Official should consider in reaching a decision;
4. Signature or other verification of identity upon request; identification of the individual or organization who authored the comments(s) is necessary for appeal eligibility;
5. For multiple names or multiple organizations, a signature must be provided for the individual authorized to represent each organization, or for each individual that wishes to have appeal eligibility, and
6. Individual members of organizations must submit their own comments to meet the requirements of appeal eligibility as an individual, comments received on behalf of an organization are considered as those of the organization only.

All comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record on this proposed action and will be available for public inspection. Send your comments to:

Galena Cell Tower Analysis  
2647 Kimberly Road East  
Twin Falls, Idaho 83301-7976

Phone (208) 737-3200 / FAX (208) 737-3236

Comments may also be mailed electronically in a format (pdf, txt, rtf, or document compatible with Microsoft Office applications) to:

[comments-intermtn-sawtooth@fs.fed.us](mailto:comments-intermtn-sawtooth@fs.fed.us)

or hand-deliver your comments to the Sawtooth National Forest – Headquarters Office, located at 2647 Kimberly Road East, Twin Falls, during normal business hours from 8:00 am to 4:30 pm, Monday through Friday, excluding federal holidays.

Additional information on the proposed action may be obtained by contacting Jackie Richter, phone (208) 737-3200. Additional information may also be found on our Sawtooth Forest website at: <http://www.fs.fed.us/r4/sawtooth/projects/> where you can find the 2008 Galena Summit Communications Site Environmental Analysis (EA), the July 2008 Decision, as well as the final Appeal Decision letters.

If you wish to comment, you must do so during the 30-day comment period. This is your opportunity to comment prior to a decision being made. I anticipate making a decision in early May, 2009.

## **APPEAL ELIGIBILITY**

It is the responsibility of persons providing comments to submit them by the close of the comment period. Those who provide comments during this comment period as described above are eligible to appeal the decision under the Federal Code of Regulations (36 CFR 215).

## **TIMEFRAMES**

February 2009	2 <sup>nd</sup> Formal Comment Period for the Proposal
March - April, 2009	Analyze comments received
May, 2009	Issue new Decision