



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720
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March 15, 2019

Dan Carlson, AICP
Community Development Services Director
411 North Ruby St., Suite 2
Ellensburg, WA 98926

RE: WDFW Comments on AT&T Teanaway Cell Tower ACU-19-00001

Dear Mr. Carlson,

Thank you for the opportunity to comment on the Administrative Conditional Use Permit for a cell tower located on the Teanaway Community Forest (ACU-19-00001), henceforth referred to as “the project”. Washington Department of Fish and Wildlife (WDFW) has reviewed the application and supporting documents. This proposed cell tower is located on the Teanaway Community Forest (TCF), of which WDFW is a co-manager of the forest along with Department of Natural Resources (DNR). The management plan adopted for the TCF sets clear indicators that the forest must be managed as a working forest while conserving values for species habitats along with recreation interests that are consistent with watershed protection.

To protect these resource values on the TCF and make sure that the proposed project is consistent with management goals of the forest, WDFW requests that the following items be clarified and provided to WDFW and DNR prior to the project being approved and constructed.

1. The project is generally following USFWS guidance for avian protection measures on cell towers, but need clarification or modifications on two points—1. They say no external lighting is planned for the project, but the project should clarify that is true for all external buildings. If any exterior lighting is used, it should be downward facing. 2. There is no exclusion device planned for the top of the tower. If the current design is constructed (see below on proposed alternate design), the project should install a raptor nest exclusion device so that there are not conflicts between raptor nest and cell tower function. There are other trees in the vicinity (potential alternate nest sites), so installing a nest platform as compensation isn’t necessary.
2. The project needs to provide more details on the facilities;
 - a. more details on perimeter security fence installed (it needs to be at least 8 foot in height to exclude deer and elk and of a design that will not harm wildlife, single strand barb wire or no top wire),

- b. explanation of why the solar panel array and the propane tank is outside of the fence-this is public land, so are there concerns over public having access to either the panels or the propane tanks,
 - c. clarification on the generator plan, the SEPA checklist states a diesel generator, yet the plans show a propane generator and how do the solar panel array factor into the plan,
 - d. details on proposed retaining wall for slope stability on the western end, such as a grading plan, what is the footprint disturbance that will need to be restored.
3. Weed control; the project is installing a weed block in their fenced area, but no details on how any other disturbed land will be managed for weed control.
4. Fire control; the project needs to address how they are ensuring that fire will not be an issue at the site, with propane tank and electrical items such as generator and solar panel array. Further details on the access road are needed-will it be fully rocked so no veg is growing up in the road and creating a potential vehicle hazard for fires?
5. Revegetation of any disturbed soils; the project is up in thin lithosol soils, they need to do soil management so that the topsoil can be set aside and replaced on top for best success in reseeded. The project should consult with WDFW on revegetation plan of disturbed areas and suitable native seed mix.
6. Aesthetics, to make the tower more easily blend into the forested landscape, the project should consider replacing the proposed lattice tower with a monopine tower which is more aesthetically in line with the surrounding forest for both habitat and recreational interests.

Prior to construction the project developer needs to provide these details to WDFW and DNR to ensure that the project is compatible with land management of the TCF. Please contact me at (509) 457-9307 or Scott.Downes@dfw.wa.gov, to discuss further details on these items.

Sincerely,



Scott Downes
Area Habitat Biologist

Cc: Perry Harvester, WDFW
Mike Livingston, WDFW
Larry Leach, DNR