

Finding of No Significant Impact for South Mountain Tower

Introduction

The City of Phoenix proposes to replace an existing 225-foot monopole with a new 250-foot four-leg, self-supporting lattice tower and remove a nearby 125-foot monopole that would be obsolete with the new proposed tower. The South Mountain Tower Site Number One Environmental Assessment (EA) provides an analysis of potential environmental impacts associated with the use of grant funds issued by the Public Safety Interoperable Communications (PSIC) Grant Program, administered by the National Telecommunications and Information Administration (NTIA) of the U.S. Department of Commerce, to build this facility and associated equipment in Maricopa County, Arizona.

Scope of the Environmental Assessment (EA)

The proposed South Mountain Tower project would apply funds issued by the PSIC Grant Program. The PSIC Grant Program was developed to assist State, local, tribal, and non-governmental agencies in developing interoperable communications as they leverage the newly available spectrum in the 700 megahertz (MHz) band. As a condition of the PSIC Grant Program, grantees must comply with all relevant Federal legislation, including the National Environmental Policy Act (NEPA) of 1969.

The NTIA has specified that PSIC grant funds must be used for projects that would improve communications in areas at high risk for natural disasters and in urban and metropolitan areas at high risk for terrorism threats, and should include pre-positioning or securing of interoperable communications for immediate deployment during emergencies or major disasters. Investments receiving PSIC funds can range from the installation of new large-scale infrastructure (e.g., communications towers) to the acquisition of mobile / portable handheld radios. As outlined in the PSIC Grant Program's Programmatic EA (February 2009) and Final Finding of No Significant Impact (FONSI) (April 2009), the proposed South Mountain Tower project site is classified as a transmission and receiving site.

The proposed South Mountain Tower project would allow for the following:

- Additional capacity to allow for a higher volume of interoperability cases,
- Increased coverage area for interoperability, and
- Providing a common interoperability platform to facilitate reliable interoperable communications.

The South Mountain Tower Site Number One EA examines the Proposed Action to replace an existing 225-foot monopole with a new 250-foot four-leg, self-supporting lattice tower and remove a nearby 125-foot monopole that would be obsolete with the proposed new tower. The proposed site is located on City property in the South Mountain Communications Site within the Phoenix South Mountain Park, near the southern boundary of the Phoenix city limits. The South Mountain Communications Site is located on the spine of South Mountain and includes 46 communication towers (including monopoles, guyed towers, and lattice towers) and 41 equipment buildings used by 104 licensees. The EA analyzes existing conditions and environmental consequences of the Proposed Action for 11 resource areas: noise, air quality, geology and soils, water resources, biological resources, historic and cultural resources, aesthetic and visual resources, land use, infrastructure, socioeconomic resources, and human health and safety.

Alternatives Considered

Alternative 1 (Preferred Alternative). Alternative 1 (Preferred Alternative) is to replace an existing 225-foot monopole with a new 250-foot four-leg, self-supporting lattice tower and remove a nearby 125-foot monopole that would be obsolete with the proposed new tower at South Mountain Tower (Site 1). The proposed site is located on City property in the South Mountain Communications Site within the Phoenix South Mountain Park, near the southern boundary of the Phoenix city limits. The South Mountain Communications Site is located on the spine of South Mountain and includes 46 communication towers (including monopoles, guyed towers, and lattice towers) and 41 equipment buildings used by 104 licensees. This site was selected because of its strategic location on one of the highest peaks in Phoenix, and it is well suited to provide wide area radio coverage to the Phoenix metropolitan area as well as to the City of Maricopa, Gila River Indian Community, and the Interstate 10 corridor to the south. The area of ground disturbance would be limited to less than one-third acre. Existing utilities for electrical power are present at the South Mountain Park. A temporary staging area, about 500 feet south of and down slope of the tower would be used during construction. Approximately 100 cubic yards of excess excavated rock would be temporarily stockpiled in an existing materials stockpile area about 1.8 miles west of the tower. The existing South Mountain Communications Site is extensively used by many agencies to provide radio communications. Given that the proposed South Mountain Tower site is located at an existing radio communications site, Alternative 1 minimizes the amount of construction and cost required to implement the network as it would utilize an existing equipment building on South Mountain for the planned upgrades. Construction of a new equipment building would not be necessary. The existing backup generator has ample capacity to operate the proposed upgrades to the facility and would not need to be replaced. Due to the topographic location and placement of the facility on the eastern end of the South Mountain Communications Site, Alternative 1 is best suited to interface with the existing Regional Wireless Cooperative (RWC) network. The proposed tower would provide an adequate platform for the existing applications, the new high site initiative, and future growth. In addition, replacement of the two older monopoles with a single tower is consistent with the Phoenix Parks and Recreation Department's mandate of consolidation and no new growth at the South Mountain Communications Site.

No Action Alternative. Under the No Action Alternative, the current radio system coverage would not be met causing serious limitation on emergency response and funding for interoperable communications and information systems infrastructure would not be released. Ongoing maintenance activities would continue using the current funding sources; however, the safety and interference concerns associated with the existing 225-foot monopole would not be addressed. The No Action Alternative would not address the needs of the City of Phoenix, RWC, and other local, County, State, tribal, and Federal interoperability users. The No Action Alternative served as the baseline for assessing the impacts of the alternatives in the Draft EA.

Alternatives Considered But Not Carried Forward

One alternative site was examined to determine the range of reasonable alternatives to implement the Proposed Action. The site considered was a Department of Public Safety (DPS) site located on the western end of the existing South Mountain Communications Site. In order to upgrade the DPS site to meet project needs, the City would need to construct a new tower to provide adequate space and load capacity for the new communications system, and a new building and larger-capacity generator also would be required. This project was not carried forward as it is not consistent with the Phoenix Parks and Recreation Department's mandate of consolidation and no new growth at the South Mountain Communications Site. If the DPS site were carried forward, the structural and interference problems of the existing 225-foot monopole on the South Mountain Tower 1 site also would not be addressed.

Recommended Alternative

Alternative 1 (Preferred Alternative) to construct the proposed South Mountain Tower project is recommended for implementation and best meets the purpose and the need of the City of Phoenix to improve and facilitate reliable interoperable communications. The No Action Alternative would not address the communications needs for the City of Phoenix and is not consistent with the Phoenix Parks and Recreation Department's mandate of consolidation and no new growth at the South Mountain Communications Site.

Consultations

Coordination on fish and wildlife issues to meet the Section 7 requirements of the Endangered Species Act (ESA) was accomplished through a preliminary review of protected species from the U.S. Fish and Wildlife Service (USFWS) Division of Endangered Species Web site to identify listed and proposed threatened and endangered species as well as critical habitats that may be located on or near the proposed site. Based on a review of the USFWS Web site and correspondence with the USFWS Arizona Ecological Services Field Office, only one protected species was identified as occurring on South Mountain, the Sonoran Desert tortoise (*Gopherus agassizii*). Habitat for this species is not present near the project area; however, vegetation in the area may be suitable for use by the species. On January 19, 2010, the USFWS Arizona Ecological Services Field Office noted that the avoidance of rock outcrops was appropriate and concurred with the determination that the Proposed Action will not affect any federally-listed species or their habitats. In addition, coordination with the Arizona Department of Game and Fish was conducted. On January 21, 2010, the Arizona Department of Game and Fish reported that they did not anticipate any significant adverse impacts to wildlife resources would occur as a result of the project.

Coordination on historic and cultural resources issues was accomplished with the City of Phoenix Historic Preservation Office and the Cultural Resources Working Group of the Four Southern Tribes to determine whether the construction of the proposed tower may generate any short- or long-term indirect impacts to historic and cultural resources or may be located within the viewshed of any historic and cultural resources. An archaeological evaluation was conducted to assess the potential direct effects the Proposed Action may have on archaeological resources. The archaeological evaluation concluded that no archaeological resources eligible for inclusion in the National Register of Historic Places would be affected by the Proposed Action. Letters were submitted to the City of Phoenix Historic Preservation Office to identify any potential impacts to historical or archaeological resources in the area. A response letter was received from the City of Phoenix Historic Preservation Office on February 12, 2010 concurring with the determination that the Proposed Action would not impact historical or archaeological resources in the area.

The Gila River Indian Community and Salt River Pima-Maricopa Indian Community have passed resolutions declaring the South Mountains to be a sacred place/traditional cultural property because of the prominent role the mountains have in oral traditions and songs of the Akimel O'odham (Pima) and Pee Posh (Maricopa) tribes. The removal of two monopoles and installation of a replacement tower would not be expected to affect the traditional cultural values of the South Mountains. A cultural resource survey did not identify any historical or archaeological artifacts or features. Appropriate Tribal Historic Preservation Officers (THPO) of Federally-recognized Native American Tribes with known ancestral rights to Maricopa County were consulted to determine the potential effect from the Proposed Action. The traditional cultural significance of the South Mountains and the nature of the impacts, however, are defined by the perspectives of traditional Akimel O'odham and Pee Posh. On October 15, 2009, City Archaeologist Todd Bostwick and other staff presented information at a meeting of the Cultural Resources Working Group of the Four Southern Tribes. Barnaby Lewis, THPO of the Gila River Indian Community, confirmed that the South Mountains are a sacred traditional cultural resource for the Four Southern Tribes (Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian Community, and Tohono O'odham Nation) and indicated that the tribes would object to new

communication towers on the mountain, but the proposed replacement tower seemed to be a justifiable project and would have a minor impact on the mountain. Subsequently, none of the tribes objected to the Proposed Action. The Gila River Indian Community sent a letter on February 9, 2010 confirming the project's no adverse effect on cultural resources. A public notice was issued for the proposed tower replacement as part of the Parks Board public meeting held on November 19, 2009 to obtain approval for the proposed project. No public or agency comments were received.

Findings and Conclusions

The proposed South Mountain Tower project is not likely to result in any environmental impacts and does not involve any unusual risks or impacts to sensitive areas. The Proposed Action would require construction of a new transmitting and receiving 250-foot self-support, four-leg communications tower to replace to existing monopole towers with ground disturbance activities (totaling less than one-third of an acre). In accordance with 47 Code of Federal Regulations (CFR) Section 1.1307(a) (1) through (8), an evaluation was made to determine whether any of the listed Federal Communications Commission (FCC) special interest items would be significantly affected if a tower structure and associated equipment control cabinets were constructed at the proposed site location. No FCC special interest items were identified.

NTIA Review

NTIA determined that the April 2010 South Mountain Tower Site Number One EA accurately assessed the potential individual and cumulative environmental impacts of the proposed replacement tower as a 250-foot self-support, four-leg communications tower and that the scope, alternatives considered, and content of the EA are adequate.

This FONSI is based on the attached EA which has been independently evaluated by the NTIA and determined to adequately and accurately discuss the environmental issues and impacts of the proposed project and provides sufficient evidence and analysis for determining that an environmental impact statement is not required.

Based on the best available information and NTIA's independent review, NTIA has decided to adopt the April 2010 South Mountain Tower Site Number One EA. The EA will be available for public review at http://www.ntia.doc.gov/psic/NEPA_sub3.html. This FONSI has therefore been prepared and is being submitted to document environmental review and evaluation in compliance with NEPA. The decision documents for the environmental review of the Proposed Action are attached.

I have considered the information contained in the EA, which is the basis for this FONSI. Based on the information in the EA and this FONSI document, I agree that the Proposed Action as described above, and in the EA, will have no significant impact on the environment.

5/7/10
Date

Laura M. Pettus
Laura M. Pettus
Department of Commerce
National Telecommunications and Information Administration

RPM
Responsible Program Manager

ADOPTION OF EXISTING ENVIRONMENTAL DOCUMENT

Description of proposal: South Mountain Tower to replace two existing monopole towers

Proponent: City of Phoenix

Location of current proposal: South Mountain Communications Park, Maricopa County, Arizona

Title of document being adopted: South Mountain Tower Site Number One

Agency that prepared document being adopted: City of Phoenix, Arizona

Date adopted document was prepared: April 13, 2010

Description of document (or portion) being adopted: The proposed South Mountain Tower project would include a 250-foot self-support four-leg lattice tower within the existing South Mountains Communications Site. The new tower would replace an existing 225-foot-tall monopole with a new 250-foot tall four-leg, self-supporting lattice tower and a nearby 125-foot monopole. The proposed site topography provides natural height resulting in enhanced coverage with the proposed 250-foot tower. The total ground-disturbance would be less than one-third of an acre. Existing utilities for electrical power are present at the existing South Mountains Communications Site, as is an existing access road. The tower construction for this Proposed Action does not have any significant environmental impacts or extraordinary circumstances.

The document is available to be read at: http://www.ntia.doc.gov/psic/NEPA_sub3.html

The Department of Commerce has identified and adopted this document as being appropriate for NTIA's purposes after independent review. The document meets its environmental review needs for approval under the PSIC Grant Program and will accompany the proposal to the decision maker.

Name of agency adopting the document: National Telecommunications and Information Administration (NTIA)

Contact person if other than responsible official: N/A

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DATE OF ISSUE: May 4, 2010

SIGNATURE:

Signed:

Laura M. Pettus, RPM

Date:

5/7/10