

National Environmental Policy Act (NEPA) Report



Prepared for:



Milestone
COMMUNICATIONS

C/o Entrex Communications Services Inc.

Chancellorsville Substation

**11100 Gordon Road, Fredericksburg, VA 22401
Spotsylvania County**

Prepared by:



**Aarcher, Inc.
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Issuance Date: February 22, 2017



February 22, 2017

Milestone Communications
C/o Entrex Communication Services, Inc.
Ms. Colleen Khan
6600 Rockledge Drive, Suite 550
Bethesda, MD 20817

Re: FCC NEPA Screening – NEW TOWER SITE
Chancellorsville Substation
11100 Gordon Road
Fredericksburg, VA 22401
Archer Project # 090026.09.0027

Dear Ms. Khan:

AARCHER, INC. (AARCHER) has completed an environmental screening of the above-referenced Milestone Communications project. An evaluation was made to determine whether any of the items specified by the Federal Communications Commission (FCC), within 47 CFR 1.1307 (a), would be adversely affected by the proposed construction of a telecommunications tower facility at Subject Property. AARCHER consulted with appropriate State and Federal agency personnel, and reviewed readily available, published lists, files, and maps, to complete this review.

Site Name / Site Number	Chancellorsville Substation
Address	11100 Gordon Road, Fredericksburg, VA 22401
USGS Map	<i>Salem Church, VA (1997), Spotsylvania, VA (1997), Brokenburg, VA (1985), and Chancellorsville, VA (1999) [7.5-minute series topographic quadrangle]</i>
Subject Property Description	The Subject Property is located within a partially wooded, rural/residential lot. Review of aerial photographs dating back to 1963, depict the Subject Property to be used as cultivated farm land.
Proposed Action at the Subject Property	Milestone Communications is proposing to build a 150-foot Monopole Telecommunications Tower with a 6-foot lightning rod in the vicinity of 11100 Gordon Road, Fredericksburg, Spotsylvania County, VA 22401 (NAD 83) 38°, 15', 41.1"N; 77°, 35', 20.2" W. The overall tower height will be 156 feet. The project will consist of the installation of the tower and equipment cabinet within a proposed 35-foot by 74-foot fenced compound. The site has access and utility easements from Salem Field Boulevard along a proposed 12-foot by 580-foot access road to the tower site. Milestone Communications has designated the Subject Property as site "Chancellorsville Substation."

Per FCC NEPA regulations, an Environmental Assessment (EA) must be prepared and submitted to the FCC for review if it is determined that the construction of the proposed tower facility may adversely affect items (1) through (8) of 47 CFR 1.1307(a).



Based on the review of readily available published lists, files, maps, and agency coordination regarding potential effects to FCC regulated NEPA concerns, the proposed new tower facility will not adversely affect any of the resources listed under items (1) through (8) of 47 CFR 1.1307(a). Should the proposed development plans be altered, the effects of the proposed action on existing environmental conditions must be re-evaluated.

Thank you for the opportunity to complete this NEPA Screening Report. Please contact me at (410) 897-9100 x108 or jlos@aarcherinc.com should you have any questions or require additional information.


Sincerely,
AARCHER, INC.

Jason Los
Division Manager – Real Estate

Appendix A – Project Maps and Site Drawings
Appendix B – NPA Checklist and SHPO Consultation
Appendix C – Tribal Consultation
Appendix D – Federal and State Fish and Wildlife Service Consultation
Appendix E – National Wetlands Inventory Maps
Appendix F – FEMA Floodplain Maps
Appendix G – Resumes



NEPA Environmental Effects Checklist

		Site type (choose one): <input checked="" type="checkbox"/> Raw land <input type="checkbox"/> Radio tower colo* <input type="checkbox"/> Other colo*	Site Name: Chancellorsville Substation	Site Address: 11100 Gordon Road Fredericksburg, VA 22401	
NEPA Land Use Screening Checklist					
FCC NEPA Category	Consulting Agency to Contact	NP Document Reference	Check appropriate box(es) below		
			No Adverse Impact or Exclusion Applies**	Potential Adverse Impact	Collocation NPA*
1. Designated Wilderness Areas	National Park Service, US Forest Service, Bureau of Land Management (BLM)	Section 3.4.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Designated Wildlife Preserves	National Park Service, US Forest Service, BLM	Section 3.4.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Threatened or Endangered Species & Critical Habitats	US Fish & Wildlife Service - Field Office (USF&WS)	Section 3.4.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Historic Places	State Historic Preservation Officer Tribal Historic Preservation Officer, Native Hawaiian Organizations	Section 3.4.3	<input checked="" type="checkbox"/> Exclusion <input type="checkbox"/>	<input type="checkbox"/>	Colo NPA <input type="checkbox"/>
4a. Tribal Notice	Tribal Historic Preservation Officer (THPO), Native Hawaiian Organizations***	Section 3.4.3	No Interest <input checked="" type="checkbox"/> Exclusion <input type="checkbox"/>	No Reply <input type="checkbox"/> Impact <input type="checkbox"/>	Colo NPA <input type="checkbox"/>
5. Indian Religious Sites	American Indian Tribes, Bureau of Indian Affairs	Section 3.4.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Floodplain	Federal Emergency Management Agency (FEMA)	Section 3.4.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Wetlands & Surface Waterways	US Army Corps of Engineers (ACOE)	Section 3.4.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. High Intensity White Lights in Residential Neighborhoods	N/A	Section 3.4.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* For collocations, only NEPA Land Use Screening Category 4 is required. The remaining categories are excluded.

** Most exclusions still require Tribal Notification.

Prepared By: Jason Los Company: AARCHER, INC.

(Print Name): Jason Los Date: February 22, 2017



(1) Officially Designated Wilderness Areas

AARCHER reviewed information readily available from the U.S. Department of Agriculture's National Wilderness Preservation System (NWPS) to determine whether the proposed facility is located within the boundaries of an officially designated wilderness area. The NWPS is comprised of lands designated as wilderness area by the U.S. Forest Service and the U.S. Department of the Interior. Additionally, AARCHER utilized the U.S. Department of Interior's National Map to confirm that the Subject Property is not located within the boundaries of an officially designated wilderness area. Copies of the NWPS search and National Map are included within Appendix D.

Based upon sources reviewed, the proposed undertaking is not located within an officially designated wilderness area.

Sources:

National Wilderness Preservation System (NWPS) (<http://www.wilderness.net>)
U.S. Department of Interior (DOI) National Map (<http://www.nationalmap.gov>)

(2) Officially Designated Wildlife Preserve

AARCHER reviewed information readily available from the USFWS National Wildlife Refuge System to determine whether the proposed facility is located in an officially designated wildlife preserve. Additionally, AARCHER utilized the U.S. Department of Interior's National Map to confirm that the Subject Property is not located within the boundaries of an officially designated wilderness area. A list and map of the wildlife refuges within 50-miles of the proposed tower location and a copy of the National Map are provided in Appendix D.

In addition, the project was submitted to the Virginia Department of Conservation and Recreation for review. Agency correspondence is included in Appendix D.

Based upon sources reviewed, the proposed undertaking is not located within an officially designated wildlife preserve.

Sources:

USFWS National Wildlife Refuge System (<http://refuges.fws.gov/>)
U.S. Fish & Wildlife Service Virginia Ecological Services Field Office
Virginia Department of Conservation and Recreation
Virginia Department of Game and Inland Fisheries
U.S. Department of Interior (DOI) National Map (<http://www.nationalmap.gov>)

(3) Listed and/or Proposed Threatened or Endangered Species or Designated Critical Habitats (50 CFR Part 402)

AARCHER reviewed information readily available from the U.S. Fish and Wildlife Service (USFWS) to determine whether the proposed facility would potentially impact federally listed and/or proposed Threatened or Endangered Species or Designated Critical Habitats, in accordance with Section 7 of the Endangered Species Act (ESA).



On November 3, 2016 AARCHER completed an online Threatened, Endangered Species, Designated Critical Habitats Review for Spotsylvania County, Virginia, to determine the likelihood of federally-protected species being present at the Subject Property. Per the U.S. Fish & Wildlife Service Virginia Ecological Services Field Office online review, Federally-listed species (50 CFR 17), may be present within the vicinity of the Subject Property. Federally-listed species and Virginia endangered, threatened, and species of concern are known to occur within Spotsylvania County and the northern long-eared bat (*Myotis septentrionalis*) could occur in this region (IPaC 2016). However, forested and aquatic habitats do not occur on the proposed tower facility site, which is adjacent to a large electrical substation. The Subject Property consists of perennial grass and a row of evergreen, landscaping trees. Based on the review of federally-listed species, consideration of their preferred habitat conditions, and site reconnaissance, AARCHER determined that the proposed tower facility location does not feature limited woodland habitat characteristics preferred by the listed species, northern long-eared bat. Therefore, the proposed tower project will have no effect on listed species or their habitat due to the location of the proposed site adjacent to a large electrical substation. Additionally, migratory bird species would not be attracted to this area.

On November 4, 2016 AARCHER completed a site walk of the Subject Property. Based on site conditions observed during this reconnaissance survey, the habitat at the Subject Property does not match the habitats of listed threatened and endangered species identified in the vicinity of the Subject Property.

In addition, the project was submitted to the Virginia Department of Conservation and Recreation (DCR) for review on November 8, 2016. In a response dated December 5, 2016, DCR stated “Biotics documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources. DCR recommends voluntary implementation of USFWS interim guidelines for Communication Tower Siting, Construction, Operation, and Decommissioning. The current activity will not affect any documented state-listed plants or insects and there are no State Natural Area Preserves under DCR’s jurisdiction in the project vicinity. DCR also recommends consulting with the Virginia Department of Game and Inland Fisheries (VDGIF) because according to their files, the project is located within two miles of a documented occurrence of a state and federally listed animal. Agency correspondence is included in Appendix D.

AARCHER also completed a review using the Virginia Department of Game and Inland Fisheries (VDGIF) – Virginia Fish and Wildlife Information Section (VaFWIS) online search tool on November 3, 2016 and determined that wildlife species were identified within 3 miles of the project location. Based on the review of listed species, consideration of their preferred habitat conditions, and site reconnaissance, AARCHER determined that the proposed tower facility will have no adverse effect. Per the VDGIF-VaFWIS, “We appreciate your interest in submitting a project for review by VDGIF to ensure the protection of sensitive wildlife resources during project development. Due to staffing limitations and other program responsibilities, however, our Fish and Wildlife Information Services Section (FWIS) is currently unavailable to review or provide Initial Project Assessment (IPA) of proposed projects, such as cell towers. Neither FWIS nor ESS personnel are available to confirm VaFWIS subscriber findings or provide an evaluation of how the project may impact such resources, unless the project is reviewed through an interagency coordination process, in which case ESS will coordinate the Department’s review of your project. Please note that this does not constitute endorsement of your project or a lack of concern regarding anticipated project impacts; it simply means that, given our workload and other



program responsibilities, VDGIF is currently unable to accommodate such requests for project evaluation. Agency correspondence is included in Appendix D.

Further, based on the proposed design (150-foot, monopole tower with no lighting), the facility has taken into account the USFWS's recommended guidelines for tower design and citing set forth in the 'Service Guidelines on the Siting, Construction, Operation, and Decommissioning of Communications Towers,' dated September 14, 2000. Therefore, it is unlikely that proposed facility represents a significant threat to migratory birds.

Based upon sources reviewed, the proposed undertaking is not anticipated to impact federally listed and/or proposed Threatened or Endangered Species or Designated Critical Habitats.

Sources:

U.S. Fish & Wildlife Service Virginia Ecological Services Field Office
Virginia Department of Conservation and Recreation
Virginia Department of Game and Inland Fisheries

(4) Districts, sites, buildings, structures or objects, significant in American history, architecture, archeology, engineering or culture, that are listed, or are eligible for listing, in the National Register of Historic Places (NRHP) (36 CFR Part 800 regulations implementing Section 106 of the National Historic Preservation Act).

Based upon the characteristics of the proposed undertaking, it was determined that consultation with the State Historic Preservation Officer (SHPO) was required. AARCHER submitted FCC Form 620 to the SHPO requesting comments on the proposed undertaking on November 22, 2016. In an email sent by the FCC's Electronic Section 106 System dated December 22, 2016, the Virginia Department of Historic Resources informed AARCHER that "the undertaking will have No Adverse Effect on historic properties listed in or eligible for the National Register of Historic Places."

The FCC Form 620 submittal package and associated SHPO correspondence are included as Appendix B.

Sources:

Virginia Department of Historic Resources, inventory of historic properties
National Park Service, National Register of Historic Places
Nationwide Programmatic Agreement for Review under the National Historic Preservation Act (Federal Register / Vol. 70, No. 2 / Tuesday, January 4, 2005)

(5) Indian Religious Sites

Based upon the characteristics of the proposed undertaking, it was determined that Tribal consultation was required. AARCHER submitted project specific information for the proposed undertaking through the FCC's Tower Construction Notification System (TCNS) on October 7, 2016. On October 14, 2016 the Notice of Organizations detailing Tribes with interest in the project was received (Notification ID: 143805). The following table details Tribes with geographic interest in the project area, as well as, AARCHER's consultation history with these Tribes as part of the Section 106 process.



Tribe	TCNS auto-reply	Request from Tribe	Follow Up(s)	Final Reply	FCC Referral	Standing Agreements, Tribal Procedures, & Comments
Delaware Nation	Tribe requests additional project documentation and consultation fee	Tribe requests consultation fee	Initial Follow up letter with project documentation and consultation/review fee sent 12/6/2016 2nd follow up via email 1/12/2017	No properties or resources affected response received 1/12/2017	N/A	Notify Tribe of inadvertent discoveries, stop work, and contact appropriate agencies
Tuscarora Nation	No interest if no response received within 30-days of NOO	N/A	N/A	No response within 30 days of initial notification through TCNS	N/A	Notify Tribe of inadvertent discoveries, stop work, and contact appropriate agencies
Cherokee Nation	Tribe requests additional project documentation and consultation fee	N/A	Initial Follow up letter with project documentation and consultation/review fee sent 12/6/16	No response within 30 days of initial notification through TCNS	N/A	Notify Tribe of inadvertent discoveries, stop work, and contact appropriate agencies
Eastern Shawnee Tribe of Oklahoma	Tribe requests additional project documentation, SHPO reply and consultation fee 10/13/2016	Tribe requests consultation fee and cultural survey	Initial Follow up letter with project documentation and consultation/review fee sent 12/6/2016	No properties or resources affected response received 12/29/2016	N/A	Notify Tribe of inadvertent discoveries, stop work, and contact appropriate agencies
Shawnee Tribe	Tribe requests additional project documentation and consultation fee 10/13/2016	Tribe requests consultation fee, SHPO reply, cultural survey, photos, map(s)	Follow up letter with project documentation and consultation/review fee sent 1/6/2017	No properties or resources affected response received 2/7/2017	N/A	Notify Tribe of inadvertent discoveries, stop work, and contact appropriate agencies
Catawba Indian Nation Cultural Preservation Project	Tribe requests additional project documentation and consultation fee	Tribe requests consultation fee and cultural survey	Initial Follow up letter with project documentation and consultation/review fee sent 12/6/2016 2nd follow up via fax 1/26/2017 3rd follow up via phone 2/2/2017	No properties or resources affected response received 2/14/2017	N/A	Notify Tribe of inadvertent discoveries, stop work, and contact appropriate agencies

A copy of all related Tribal correspondence is included within Appendix C of this Report.



Construction and excavation activities associated with the proposed telecommunications installation must stop immediately upon the discovery of archeological or historic resources or artifacts. In the event of a discovery, *Milestone Communications* should notify AARCHER immediately for additional guidance on contacting the appropriate Tribal representatives and other applicable Federal and State agencies per 36 CFR 800.13(b).

Sources:

FCC's Tower Construction Notification System

(6) Floodplains (Executive Order 11988 and 40 CFR Part 6, Appendix A)

AARCHER reviewed the Flood Insurance Rate Map (FIRM) that includes the Subject Property and proposed Subject Property (Spotsylvania County, Virginia, Community Panel Number 5103080075C, dated February 18, 1998). The Subject Property is located in an area designated as "Zone X", which is outside the 100-year floodplain. A copy of the FEMA FIRM is included in Appendix F.

Sources:

Federal Emergency Management Agency, Flood Insurance Rate Map (<http://msc.fema.gov>)

(7) Significant change in surface features (e.g., wetland fill, deforestation or water diversion) (Executive Order 11990 and 40 CFR Part 6, Appendix A)

AARCHER reviewed USFWS National Wetlands Inventory (NWI) maps online and conducted a site visit to determine whether a significant change in surface features would occur as a result of the proposed undertaking. The Subject Property is not within a documented wetland area and the proposed construction activities would not result in deforestation, water diversion, or significant changes in surface features. A copy of the NWI map is included as Appendix E.

Sources:

US Fish and Wildlife Service, National Wetlands Inventory map (<http://nationalmap.gov>)

(8) High Intensity White Lights

According to the Chancellorsville Substation Site Plans, provided by Milestone Communications, site development does not include installation of high intensity white lights in a residential neighborhood.

Sources:

Milestone Communications Concept Plan and Lease Exhibits

(9) Radio Frequency Radiation

The FCC requires that human exposure to radiofrequency radiation (RF) must be below the limits set in 47 CFR 1.1310 and 2.1093. Milestone Communications is responsible for ensuring the proposed undertaking will not exceed appropriate limits.