

**National Telecommunications and Information Administration  
Broadband Technology Opportunities Program  
Finding of No Significant Impact  
Los Angeles Regional Interoperable Communication System Joint Powers Authority  
LA-RICS Long Term Evolution Project**

**Summary**

The Los Angeles Regional Interoperable Communication System Joint Powers Authority (LA-RICS) applied to the Broadband Technology Opportunities Program (BTOP) for a grant to construct a 700 MHz Long Term Evolution (LTE) wireless broadband communications network, consisting of 231 existing telecommunication sites. New monopole structures and associated infrastructure will be installed at up to 223 sites. Antenna structures will be placed on existing buildings at six sites. The remaining two sites will have antennas installed on existing towers. On a site-by-site basis, existing equipment (including existing towers) at the 231 LTE sites will be considered for use to minimize project costs and potential environmental impacts. The new wireless network will provide broadband services for mission-critical communications to support emergency services in Los Angeles County and allow for interoperability among local, state, and federal entities. The network will be located wholly within Los Angeles County, with exception of one site located wholly within in Orange County, and one site straddling the boundary between Los Angeles and San Bernardino counties. The project is referred to as the LA-RICS Long Term Evolution Project (Project).

The National Telecommunications and Information Administration (NTIA) awarded this grant through BTOP, as part of the American Recovery and Reinvestment Act (ARRA). The funding must be obligated and the Project completed within three years. This timeline will comply with the laws and regulations governing the use of this ARRA grant funding.

BTOP supports the deployment of broadband infrastructure in unserved and underserved areas of the United States and its Territories. As a condition of receiving BTOP grant funding, recipients must comply with all relevant Federal legislation, including the National Environmental Policy Act of 1969 (NEPA). Specifically, NEPA limits the types of actions that the grantee can initiate prior to completing required environmental reviews. Some actions may be categorically excluded from further NEPA analyses based on the specific types and scope of work to be conducted. For projects that are not categorically excluded from further environmental review, the grant recipient must prepare an Environmental Assessment (EA) that meets the requirements of NEPA. After a sufficiency review, NTIA may adopt the EA, use it as the basis for finding that the Project will not have a significant impact on the environment, and issue a finding of no significant impact (FONSI). Following such a finding, the BTOP grant recipient may then begin construction or other activities identified in the EA, in accordance with any special protocols or identified environmental protection measures.

LA-RICS completed an EA for this Project in October 2014. The U.S. Forest Service (USFS) is a Cooperating Agency for this Project and has provided information, comments, and technical expertise to LA-RICS and NTIA.

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NTIA reviewed the EA, determined it is sufficient, and adopted it as part of the development of this FONSI.

The Project includes:

- Installing a new monopole tower, broadband radio base station (known as eNodeB), network and backhaul equipment, antennas and cabling, and an emergency backup power generator at 223 "non-collocation" sites;
- Installing new antenna structures onto existing buildings, a new outdoor equipment cabinet, cabling, and a backup generator at six other "non-collocation" sites;
- Installing eNodeB equipment, network and backhaul equipment, antennas and cabling, and an emergency backup power generator at two "collocation sites," Claremont Microwave Tower (CLM) and Culver City Communications Tower (CULV001), which have existing tower structures,;
- On a site-by-site basis, possibly utilizing existing space and existing equipment (including existing towers) at the 231 LTE sites rather than installing new equipment and/or towers; and
- Installing underground conduit for sites where a monopole tower is proposed to provide electrical wiring and communications cable pathway between the outdoor system components (i.e., the equipment cabinets and the emergency generator) and the nearest utility supply on site premises, and between the monopole and the equipment cabinets.

Based on a review of the analysis in the EA, NTIA has determined that the Project, implemented in accordance with the preferred alternative and programmatic agreement (PA), and incorporating best management practices (BMPs), construction management requirements (CMRs), and mitigation measures (MM) identified in the EA, will not result in any significant environmental impacts. Therefore, the preparation of an EIS is not required. The basis for this determination is described in this FONSI.

Additional information and copies of the Executive Summary of the EA and FONSI are available to all interested persons and the public through the BTOP website ([www2.ntia.doc.gov](http://www2.ntia.doc.gov)) and the following contact:

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**Purpose and Need**

The purpose of this Project is to provide dedicated broadband communication capability and capacity to improve public safety services throughout Los Angeles County. Public safety entities in the Los Angeles region currently use commercial telecommunications services (e.g., cellular phones). These are typically available on a first-come-first-serve basis, without priority to public safety entities, which can become unavailable during large-scale incidents. Additionally many of the local public safety agencies use aging systems, making interagency communication a challenge. The LA-RICS project will provide a system that offers a high degree of reliability when needed most by emergency response providers.

**Project Description**

LA-RICS will construct a wireless broadband network by using 231 existing publicly owned or administered safety facilities or communications sites, currently developed for use in emergency services and/or as communications structures. Los Angeles County and other county/city public services agencies own or administer 227 of the 231 sites. Nine sites are located within the Santa Monica Mountains National Recreation Area (SMMNRA) and overseen by the National Park Service (NPS). Four project sites are on lands administered by:

- Bureau of Land Management (BLM) Ridgecrest Field Office at site Blue Rock (BRK);
- U.S. Forest Service (USFS) Angeles National Forest (ANF) at sites Burnt Peak (BUR) and Los Angeles County Fire Department Camp 9 (LACFCP09); and
- U.S. Army Corps of Engineers (USACE) Los Angeles District at site Los Angeles Fire Station 088 (LAFD088).

LA-RICS and the USFS are continuing to evaluate the proposed LACFCP09 site, and two alternative sites: Loop Canyon and Contractor's Point. LA-RICS has determined that the Loop Canyon and Contractor's Point sites do not meet the purpose and need. If LA-RICS and the USFS cannot agree on use of the LACFCP09 site, no LTE equipment will be installed at either LACFCP09 or either of these alternative sites within the ANF. LA-RICS is also consulting with the Federal Aviation Administration (FAA) to ensure that the proposed monopoles will not interfere with airports and navigation. Several sites are on or near airport sites and appropriate permitting to be complete before LA-RICS begins project implementation at those sites

For all of the proposed sites, LA-RICS will enter into agreements for lease, special use, right-of-way agreements, or outgrant with the site owners/administrators before beginning construction. No permanent acquisition or change of ownership will be required at any site.

New self-supporting monopoles will be installed at 223 non-collocation LTE sites. Heights of the new monopoles will range from 28 feet to 70 feet above ground level. Maximum diameter of the base of the monopoles will be 7 feet. Lightning rods up to 15-feet long will be affixed to the

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apex of each new monopole, resulting in a maximum tower height of 85 feet above ground level. Soil excavation for installation of the monopoles will be approximately 7 feet in diameter and up to 36 feet deep.

Depending on local jurisdiction and LTE site owner requirements, some monopoles will be disguised as palm trees, pine trees, flagpoles, or hose towers, or incorporated into architectural elements. Disguises would be designed in coordination with LA-RICS and local jurisdictions, as well as federal and state land administrators. For USFS lands, LA-RICS will disguise monopoles and other LTE site structures in accordance with the USFS' "Built Environment Image Guide" and other applicable federal guidance. Each LTE site will be equipped with up to four lockable equipment cabinets, used to house the eNodeB and backhaul equipment, network equipment, and backup batteries. The cabinets will be mounted on 12-inch concrete pads, measuring 18 feet by 9 feet. In addition, the LTE sites will be equipped with a 35kW diesel generator installed at ground level on a 12-inch thick concrete pad, measuring 12 feet by 6 feet. If site space is available, the equipment cabinets can be collocated with emergency generators on concrete pads up to 234 square feet.

At six LTE sites, antenna structures will be mounted on rooftops, parapet, or walls of existing buildings. The antenna structures will be up to 34 feet tall (including a 15-foot lightning rod, if one does not already exist) above existing rooflines. An outdoor equipment cabinet will be mounted on the roof near the antennas. Ground disturbance for ancillary equipment and other appurtenances (e.g., generators) at sites with roof- or wall-mounted antenna installation will be similar to that described for monopole sites.

The remaining two sites are the "colocation" facilities, which are existing towers (site names: CLM and CULV001) with capacities to hold new LTE antenna equipment. These sites will receive eNodeB equipment, network and backhaul equipment, antennas and cabling, and an emergency backup power. Existing buildings will be used to house the equipment cabinets indoors. Existing generator equipment will be used for backup power. There will be no ground disturbance at the colocation facilities.

LA-RICS will install new antennas on new monopoles, existing towers, and existing buildings, in accordance with applicable Federal Communications Commission (FCC) regulations and industry standards. Each LTE site is currently served by utility-provided power, and the LTE equipment will remain connected to existing power grids using existing utility infrastructure. LA-RICS will coordinate with site owners and administrators if electrical upgrades are required at any LTE site.

For sites where a monopole tower is proposed, underground conduit will be installed in a trench measuring 2 feet wide by 3 feet deep to provide electrical wiring and communications cable pathway between the outdoor system components and the nearest utility supply on site premises, and between the monopole and the equipment cabinets. Trenching will not exceed 500 feet at any LTE site and will occur only in previously disturbed or developed designated work areas.

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For sites where antennas are proposed to be mounted on a rooftop penthouse or to be mounted to the parapet or wall of an existing building, electric connection will be made via electrical metallic conduits surface-mounted to the roof or through existing cable pathways in the building.

Construction at all LA-RICS LTE sites will comply with the applicable building codes and property owner requirements. At Federally owned sites, permits with accompanying construction drawings will be submitted for review and approval by the appropriate Federal land manager/administrator.

Ground disturbance will be less than the 3,600 square feet required at each site, to install LTE system equipment, monopole towers, ancillary components, and cables. All excavation work will be completed within existing property boundaries. Where feasible, excavated earth will be used as backfill; excess material will be removed from the site for proper disposal. Total potential ground disturbance for the Project (231 LTE sites combined) is 19 acres. No new disturbance will occur for storage of equipment or material at any site. No new road improvements or construction are planned.

### **Alternatives**

The EA includes an analysis of the alternatives for implementing the Project to meet the purpose and need. NTIA also requires that an EA include a discussion of the no action alternative. The following summarizes the alternatives analyzed in the EA.

*Preferred Alternative.* This alternative involves construction of a wireless broadband network by using 231 existing publicly owned or administered safety facilities or communications sites, currently developed for use in emergency services and/or as communications structures. New monopole towers, along with supporting infrastructure, will be installed at 223 non-collocation sites. At six additional non-collocation sites, new antenna structures, including supporting infrastructure, will be installed onto existing buildings. In addition, LA-RICS will install eNodeB equipment, network and backhaul equipment, antennas and cabling at two collocation sites with existing tower structures. On a site-by-site basis during final design, existing space and existing equipment (including existing towers) may be utilized at the 231 LTE sites rather than installing new equipment and/or towers. Also installed at each site would be outdoor system components (i.e., the equipment cabinets and the emergency generator) and conduits for cable connections.

*No Action Alternative.* No action was also considered. This alternative represents conditions as they currently exist in the Project area. Under the no action alternative, the emergency broadband network would not be constructed and the public service agencies within Los Angeles County would continue to rely upon a variety of existing technologies and radio frequency spectra, limiting their ability to communicate with each other during routine activities or emergency incidents. The EA examined this alternative as a baseline for evaluating impacts relative to other alternatives being considered.

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*Alternatives Considered But Not Carried Forward.* In addition to the Preferred Alternative, LA-RICS considered three alternatives: collocation for all 231 sites, an all-buried network, and an aerial network. The collocation alternative required that sufficient tower and associated infrastructure be available at hundreds of publicly-owned sites throughout the county, and the sites could not be sold, transferred, or abandoned so that continued operation by the LTE system would be secured. This alternative was not carried forward as there was insufficient available infrastructure and, of the available infrastructure, access and security of the LTE equipment could not be guaranteed. The all-buried alternative would require extensive acquisition of easements and/or right-of-way throughout Los Angeles County, which would increase the complexity of and time required for installation. Potentially significant trenching and blasting associated with buried cable installation may also result in environmental impacts in rural and urban areas. Therefore, it was determined that the buried cable alternative would not be a viable alternative. Installation of an all-aerial network was found to be infeasible due to limited capacity on existing poles and towers, the need to install additional utility poles in areas where they currently do not exist, and costs of system-wide installation and ongoing maintenance of aerial cable. Based on these assessments, only the Preferred Alternative and the No Action Alternative were retained for full evaluation in the EA.

### **Findings and Conclusions**

The EA analyzed existing conditions and environmental consequences of the preferred alternative and the no action alternative in 11 major resource areas, including Noise, Air Quality and Greenhouse Gases, 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. Cumulative impacts were also evaluated.

#### ***Noise***

This Project will have short-term impacts on noise due to the use of machinery, such as jackhammers and pile drivers. However, this noise will be restricted to the construction phase of the Project and there are few sensitive noise receptors along the proposed route. In urban areas, where installation and construction equipment may be more disruptive, LA-RICS will restrict construction activities to daylight hours and certain days of the week. Moreover, construction activities are not expected to exceed 30 days, with only intermittent noise generated during that period. Equipment installed at the LTE sites will result in minor increases of noise in the immediate vicinity, due primarily to emergency back-up generator use and heating, ventilating and air conditioning (HVAC) systems for the equipment cabinets. Based on the analysis, no significant noise impacts are expected as a result of project activities and operation.

#### ***Air Quality***

Operation of equipment and vehicles for site construction activities will result in emissions of air pollutants and fugitive dust. However, these air pollutant emissions will be limited to the construction period, and no significant short-term, direct impacts to regional air quality in the

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South Coast Air Basin and Mojave Desert Air Basin are expected. The Project will also result in short-term, minor increases in the use of fossil fuel and associated greenhouse (GHG) emissions during construction. LA-RICS estimates that the Project will result in the release of less than 14,200 metric tons of carbon dioxide equivalent emissions. Thus, GHG emissions are expected to be well under the Council on Environmental Quality's presumptive effects threshold of 25,000 metric tons of carbon dioxide equivalent emissions. Long-term operation and maintenance of the network will result in minimal air emissions. Based on the analysis, no significant impacts on air quality are expected.

***Geology and Soils***

Four LTE sites (LACF004, LACF140, LACOLV, and REH) are located within an Alquist-Priolo Earthquake Fault Zone. Implementation of the LTE system at these four sites is necessary to provide coverage for Los Angeles County and because other potential nearby sites would not meet the necessary criteria for site selection. Compliance with Los Angeles County building code standards and permit requirements will ensure that these LTE facilities are constructed to avoid hazards from earthquakes. Additionally, a geotechnical investigation will be conducted at each of these four sites to evaluate the foundation conditions of the site and the potential for geologic/seismic hazards affecting the site. A geotechnical report will be prepared by a geotechnical engineer registered in the state of California, in cooperation with a certified engineering geologist and other technical experts, as necessary. Final design of structures will include design criteria specified or recommended in the geotechnical report prior to approval or issuance of construction permits. With implementation of these requirements, no significant impact due to seismic hazards is anticipated.

Ground disturbance will include the excavation of up to 80 cubic yards of earth to construct each new monopole foundation and provide for the installation of ancillary components. Utility installation for new monopole sites will require underground conduit to be placed in a trench measuring 2 feet wide by 3 feet deep, and not exceeding 500 feet in length at any LTE site. After the conduits are installed, the disturbed soil surface will be restored to its original condition. Trenching will occur only in previously disturbed or developed designated work areas. Overall, ground disturbance is expected to be minor and the Project is not expected to result in substantial erosion. The potential for erosion during construction would be minimized through implementation of erosion, sediment, tracking, wind erosion, non-stormwater management, and waste management and material pollution BMPs. Based on these assessments and implementation of the BMPs, no significant impact on geology and soils is expected to occur as a result of this Project.

***Water Resources***

Surface water, including streams and wetland features, are not present within the project limits for any of the 231 LTE sites. LA-RICS will ensure best practices during Project construction to ensure water quality is not degraded, beneficial uses impaired, and/or water quality standards violated due to erosion, a construction fuel leak, or other pollutant entering a nearby stream or other waterbody. BMPs will be implemented to control sediment and pollutants in storm water

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and non-storm water runoff associated with construction according to protocols established by the California Stormwater Quality Association (CASQA). Furthermore, the Project will not contribute to runoff because new construction will take place in previously disturbed areas. Underground utility surveys will be completed to identify and avoid underground pipelines and tanks prior to ground disturbance during construction. Water used during construction will come from existing water connections located at 226 of the LTE sites. Water will be transported to the remaining five LTE sites (BMT, BRK, BUR, PHN, and SVP) where existing plumbing connections might not be available. Ten sites are located wholly or partially in a FEMA Flood Zone A (100-year floodplain). The LTE design at these locations will comply with applicable municipal flood hazard ordinances and will not change potential flood flows compared to existing conditions. The Project will not substantially interfere with groundwater recharge, or alter the course of any stream or river. Based on these assessments and implementation of the BMPs, the Project will have no significant impacts on water resources.

***Biological Resources***

LA-RICS collected preliminary background information on threatened and endangered species within the Project area through correspondence with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG). They also reviewed the California Natural Diversity Database, the West Mojave Plan Habitat Conservation Plan, and the ANF Land Management Plan. Through these efforts, LA-RICS identified state and federally listed threatened and endangered species, BLM and USDA-USFS sensitive species, and critical habitat. In addition, a reconnaissance field survey was conducted for each Project site, including a 500-foot buffer, to identify the potential occurrence of special-status species, vegetation communities, or habitats that could support these species. Based on this data, 17 federal threatened, endangered, or candidate species were identified as potentially occurring in the Project area. These species are identified in the *Biological Assessment LA-RICS Long Term Evolution Project* report (UltraSystems Environmental, Inc., May 2014). LA-RICS also determined that suitable habitat for the following species is present near or within 11 LTE sites: California condor (*Gymnogyps californianus*), coastal California gnatcatcher (*Polioptila californica*), least Bell's vireo (*Vireo bellii pusillus*), western snowy plover (*Charadrius nivosus nivosus*), and Lyon's pentachaeta (*Pentachaeta lyonii*).

On May 12, 2014, NTIA entered into informal consultation with the USFWS regarding potential significant impacts to federally listed threatened and endangered species from Project activities on the Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdesensis*), Arroyo toad (*Anaxyrus californicus*), Desert tortoise (*Gopherus agassizii*), California condor (*Gymnogyps californianus*), coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher (*Empidonax traillii extimus*), and western snowy plover, or their designated critical habitat. A Biological Assessment was submitted to the USFWS on May 12, 2014. In a letter dated July 18, 2014, the USFWS concurred with NTIA's determination that the LA-RICS project may affect, but is not likely to adversely affect the Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdesensis*), arroyo toad (*Anaxyrus californicus*), California condor, least Bell's vireo, southwestern willow flycatcher (*Empidonax traillii extimus*), desert tortoise (*Gopherus*



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*agassizii*), coastal California gnatcatcher, and western snowy plover, and their designated critical habitats.

A series of biological CMRs have been developed to minimize or avoid potential effects to biological resources, including federally protected species, during construction and operation of the LTE system and are included in the project design for each site. The construction contractor will be required to provide biologists with appropriate expertise to perform pre-construction surveys and monitor construction activities, and supervise implementation of the biological CMRs. The biologists provided by the construction contractor will be approved by LA-RICS.

Where State or Federal-listed threatened or endangered plants, and plants listed by BLM or USFS as sensitive plant species have a potential to occur on a LTE site, LA-RICS will have a biological monitor onsite whenever project-related activities have the potential to impact sensitive or native species. Habitat protection zones will be established to avoid impacts to sensitive or native habitats outside of, but adjacent to the work area.

In addition to considering potential impacts on listed species, LA-RICS evaluated potential impacts on migratory birds and other wildlife. The Project may temporarily affect wildlife, including migratory birds. Should active bird nests be identified along the Project route, a biological monitor will be present during times of construction in areas containing active bird nests, and a protective buffer will be established around the nest. Non-federally listed species, including the Burrowing owl, Golden and bald eagle, Mohave ground squirrel, Monarch butterfly, and non-listed amphibians, reptiles, and small mammals, were also identified for specific protection through employment of CMRs. Additional protective measures will also be implemented to avoid potential impacts to USFS and BLM sensitive species. The short-term presence of construction vehicles, equipment, and crews may also result in temporary noise and visual impacts to amphibian, reptilian, fish, insect, mollusk, and crustacean species. Direct and indirect impacts to these species will be minimized through the implementation of CMRs.

In an effort to avoid and minimize the spread of invasive plants and their parts, contractor vehicles and equipment will be cleaned prior to the arrival at construction sites. In addition, biological monitors will identify areas of native vegetation to be protected. Post-construction surveys for noxious weeds shall be conducted during April through May to determine the presence of invasive species. Any populations of noxious weeds shall be immediately treated under the direction of a botanist.

LA-RICS will implement additional protective measures and CMRs, which are identified in Appendix A of the final EA. No further impacts from construction, operation, or maintenance of installation equipment are anticipated. Based on this analysis and implementation of the recommended protective measures and CMRs, LA-RICS will be able to construct the wireless network with no significant adverse impacts on biological resources.

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***Historic and Cultural Resources***

In a letter dated November 5, 2010, NTIA initiated consultation with the California State Historic Preservation Offices (SHPO). This letter included a Project map and Project description, and documented the determination that the LA-RICS Long Term Evolution Project had the potential to affect historic properties. Since the original notification, LA-RICS made revisions to the original project description and engaged an archaeologist with UltraSystems to analyze the archaeological and architectural resources within the Project's area of potential effect (APE). In a letter dated August 27, 2013, NTIA provided with the SHPO with an updated project description and associated mapping.

On August 30, 2013, NTIA provided Project details, through a modified version of the Federal Communication Commission's (FCC) Tower Construction Notification System (TCNS), to two tribes interested in the Project's geographical location in California. On February 28, 2014, NTIA issued a subsequent TCNS notification updating the Project area to include San Bernardino and Orange Counties, which included an additional 10 tribal representatives that were not previously identified by TCNS. Nine tribes did not provide a response. The Morongo Band of Mission Indians and Cahuilla Band of Mission Indians responded to TCNS confirming that they have no interest in the Project. On March 21, 2014, the Soboba Band of Luiseño Indians requested additional cultural resources information through TCNS. As requested, LA-RICS provided the Tribe with specific site information and an overview map for 16 requested sites. In letters dated September 3 and 5, 2014, the Tribe concluded that they have no concern about the 16 sites. However, the Tribe requested that a qualified archaeologist be present at Blue Rock and LA County Fire Station 78, 81, and 114 during initial ground disturbing activities and that they be notified in the event that inadvertent discoveries are encountered during construction activities.

In addition, on July 16, 2013 UltraSystems contacted the California Native American Heritage Commission (NAHC) to request a review of their Sacred Lands Inventory to determine if sacred lands or other resources of significance to the Native American community were known to exist in proximity to the proposed Project.

During early Project coordination with the parties involved with Section 106 review, it was determined that the effects on historic properties would not be fully determined prior to approval of the undertaking considering the Project timeline and the number of parties involved. Therefore, a phased process for compliance with the National Historic Preservation Act (NHPA) Section 106 is appropriate. In an effort to meet the ARRA requirement to complete the Project by September 2015, and in light of on-going Project design and engineering, NTIA and LA-RICS decided to pursue a Programmatic Agreement (PA) to streamline Section 106 compliance. Preparation of a Project-specific PA is consistent with the provisions of the NHPA Section 106 implementing regulations (36 CFR Part 800) which permit Federal agencies to use PAs to establish alternative procedures for Section 106 compliance. The PA clearly lays out a process for SHPO concurrence, including addressing individual site comments, and resolution of adverse

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effects. On October 3, 2014, NTIA entered into a PA with the SHPO for the Project. LA-RICS must comply with all provisions of the PA, which are hereby incorporated by reference.

By adhering to the process for identifying, evaluating, and resolving any effects to historic properties set forth in the PA, this Project will not have any significant adverse effect on historic properties.

***Aesthetic and Visual Resources***

The planned telecommunications network will include new towers and wireless network equipment on existing towers and buildings, which are located on ridge tops, in rural and urban areas. Placement of additional wireless antennae on existing towers and structures will not significantly diminish visual quality. The effects of viewing an additional antenna will have minimal impact on local aesthetics and visual resources. The overall height of the new towers planned for this Project will be up to 85-feet high (including a 15-foot lightening rod), self-supporting, and free of guy wires to minimize potential visual impacts. The proposed LTE sites are planned to be placed within existing publicly-owned or administered safety facilities or communications sites. The towers, antennas, and equipment buildings are expected to blend in with existing development, other towers and structures, and/or the surrounding environment.

The Project will cause temporary disturbance at 25 sites located in areas having visual resources that are protected by federal, state or local plans, policies and regulations. Four sites are located on federal land administered by the USFS, BLM or USACE; 15 sites are located in the coastal zone; five sites are near the coastal zone, and one site is located in a locally designated scenic corridor that is not part of the coastal zone. Final design will be consistent with Scenic Integrity Objectives (SIO's) required in the ANF Land Management Plan, BLM's Handbook H-8410-1 for Visual Resource Management, USACE's Detailed Visual Impact Procedure, and visual resource policies and regulations provided in applicable Local Coastal Programs (LCP) and development codes. If upon submission of final design to the USFS it is determined that SIO's are not met, the USFS will supplement the EA and may require an additional plan amendment, or may deny use of the sites. Where appropriate, and in coordination with local jurisdictions, as well as federal land-administering and resource management agencies, mitigation measures will be implemented to disguise the proposed monopole towers as palm trees, pine trees, flagpoles, hose towers, or incorporated into existing architectural elements. Specifically, the proposed monopole structures for sites LACF053 and LACF072 will be disguised as "monopines," and the proposed communication tower will not be used for the purposes of signage to display a message of any kind with the exception of messages required for safety. Additionally, LTE site Lost Hills Malibu Sheriff's Station (LHS) will be adequately set back from the scenic corridor surrounding U.S. Highway 101 and the proposed tower structure will be disguised. LA-RICS is also proposing to disguise the monopole structure at the San Vicente Peak site, which is located on a former military facility along Mulholland Drive, a scenic highway providing views of the Santa Monica Mountains. The ground level LTE structures will also be set back from the scenic corridor, in accordance with AES MM 1 and AES MM 3. However, the NPS has expressed some concern about the height of the tower and the scenic view from the nearby lookout

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platform on one of the remnant missile site structures. Therefore, LA-RICS will continue working with the NPS on the design of the SVP tower site to preserve the visual quality of the scenic corridor.

Temporary impacts to visual and aesthetic resources will occur during the construction phase of the Project due to the presence of the construction equipment, materials, and work crews. Because construction vehicle traffic and Project activity will occur for approximately 30 days or less, the viewshed from the Project site will not be permanently affected. Based on these assessments and implementation of the mitigation measures, this Project will not significantly affect aesthetic or visual qualities in the region.

### ***Land Use***

Monopole construction is proposed at up to 223 existing telecommunications sites, and wireless equipment will be installed on eight existing towers and buildings; land use at these sites will not change. Minimal ground disturbance is anticipated from tower installation and construction will be temporary in nature. Disturbance at each proposed non-collocation LTE site will be limited to less than 3,600 square feet. Disturbance will be associated with the installation of LTE system equipment, monopole towers, ancillary components, and trenching for placement of conduits for utility connection at sites where a new monopole tower is required.

The land uses for 227 LTE sites under ownership by municipalities, Los Angeles County, and other county/city public services agencies are designated by the California Coastal Commission (CCC) and individual LCPs, Airport Land Use Plans, and the Los Angeles County General Plan. Three sites (LACF078, LACF157, LACFCP14) are located on lands within the contiguous boundary of the ANF, but not administered by the USFS. The County and the USFS will jointly review these sites pursuant to the County General Plan and the underlying zoning, and through the County's development permit process to coordinate compliance with applicable resource management policies. Seven of the County-owned sites (Bald Mountain [BMT], BRK, LACF065, LACF083, LACFCP09, LACFCP14, and San Vicente Peak [SVP]) are located within a County-designated Significant Ecological Area (SEA). These sites will be developed in a manner consistent with SEA policy requirements.

Nine LTE sites are located within boundaries of five County airport land use plan areas, which include the plans for the Los Angeles International, Palmdale, Van Nuys, Long Beach, and Fox Airfield airports. Because these sites are within an airport influence area, development activities will be required to comply with the land use policies of these airport plans. FAA review of these nine airport sites is required to ensure that the final design does not interfere with visual or electronic communications and is consistent with height restriction standards and procedures set forth in FAA Federal Aviation Regulations (FAR) Part 77. Consultation with the FAA is ongoing. These airport sites include: LACF129, LACF162, LACF005, LACF080, LACF095, LACF114, Lennox Sheriff's Station (LASDLNX), LBFD026, and Mira Loma Detention Facility (MLM).

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Nine sites are located within the Santa Monica Mountains National Recreation Area, which is overseen by the NPS. These nine sites include: LACF069, LACF071, LACF072, LACF088, LACF097, LACF099, Zuma Lifeguard Headquarters (LALG300), LHS, and San Vicente Peak (SVP).

Fifteen LTE sites are located within the Coastal Zone management area, and therefore must comply with the applicable coastal planning regulations. These sites include: LACF053, LACF069, LACF071, LACF072, LACF088, LACF099, LAFD049, Hermosa Headquarters (LALG100), LALG300, Lifeguard Division (LALG-HQ), Long Beach Fire Station 6 (LBFD006), LBFD021, Manhattan Beach Fire Station 1 (MBFD001), Redondo Beach Police Department (RDNBPD), and Santa Monica Fire Station 2 (SMFD002).

The land uses for the Project sites located on USFS (Sites BUR and LACFCP09) and BLM (Site BRK) lands are guided by the Angeles Forest Land Management Plan and California Desert Conservation Area Plan, respectively, and by the Sepulveda Dam Basin Master Plan for the USACE site LAFD088. With exception of site LACFCP09, the Project does not conflict with the current land uses along the proposed route.

LA-RICS has contacted the USFS, BLM, USACE, NPS, and CCC to determine the appropriate permits and approvals required to construct and operate the proposed Project within their jurisdictions. In a letter dated February 11, 2014, the USFS reported that the initial screening of the two sites had been completed, and the agency has accepted the BUR site, which can proceed through the USFS NEPA process. However, proposed activities at site LACFCP09 was determined not to be consistent with standards and guidelines in the Forest's Land Management Plan since it is not a designated communication site. Approval of the site will require a plan amendment, or the site may be denied and an alternate will have to be proposed. An additional amendment may be necessary if it is determined that the project cannot meet SIO's. The USFS has asked LA-RICS to provide additional information and analyze the feasibility of using two alternative sites, Loop Canyon and Contractor's Point, in lieu of site LACFCP09. LA-RICS investigated the two alternate sites and determined that they were not technically feasible as they would not effectively support the LTE system as a whole, and would not meet the criteria for site selection. This report was submitted to the USFS on May 16, 2014. Consultation for site LACFCP09 is still ongoing. LA-RICS will obtain the necessary permits from the USFS prior to the start of construction.

Through correspondence with BLM, confirmation was received that implementation of the Project will likely qualify for a Categorical Exclusion in accordance with BLM guidelines (516 Department of the Interior Manual Part 11). Authorization for an archaeological field investigation at BRK (based on Work Permit CA-11-14) was obtained on February 4, 2014. A new or amended Right of Way grant is required from the BLM prior to construction at BRK. Project activities at site LAFD088 may require a new or amended outgrant from the USACE or a sublease agreement issued by the City of Los Angeles with concurrence from the USACE prior

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to construction. The USACE is still determining if they will accept the BTOP EA for their independent NEPA determination or if LA-RICS will need to prepare a separate EA for site LAFD088. LA-RICS will also obtain the necessary permits from the BLM and USACE prior to the start of construction.

In consultation with the NPS, it was determined that that none of the proposed nine sites are located on land administered by the NPS. Therefore, NPS only holds an advisory and review role for the EA, and project activities do not require an NPS-issued right-of-way permit. NTIA provided the NPS with a courtesy copy of the EA for review and comment on May 21, 2014. In a letter dated July 15, 2014, the NPS concurred with the EA's impact level findings for the nine sites within the SMMNRA.

In a letter dated December 12, 2013, LA-RICS submitted a written request for consistency review to the CCC. A statement of jurisdiction and consistency finding was issued by CCC on April 24, 2014. Prior to construction on sites in the coastal zone, coastal development permits (CDPs) are required from CCC and local agencies authorized by the CCC. Consultation with the CCC is ongoing and LA-RICS will obtain all required CDPs for sites within the California coastal zone prior to construction.

Through the respective agency permitting processes, the USFS, BLM and USACE will analyze potential land use impacts and determine whether the Project is consistent with their respective land and resource management plans. LA-RICS has agreed to comply with all permit conditions issued by the respective Federal, State, and local agencies. Based on these consultations and permitting requirements, the Project is not anticipated to result in significant impact on land use.

***Infrastructure***

Site constraints associated with underground pipelines, communication cables, and similar urban infrastructure may occur when crossing a particular LTE site. Final engineering design consideration will be given to existing utility system constraints, and plans would be made to avoid them as necessary. LTE equipment will remain connected to existing power grids using existing utility infrastructure, although electrical upgrades may be required at some LTE sites. For the new tower sites, electric utilities will be extended from existing locations to provide power to the structures. The total demand for water during construction will be minor compared to the regional water supply estimated by the Integrated Regional Water Management Plan. There will be minor, short term construction impacts on roadways and traffic flow during construction activities. LA-RICS will implement traffic control measures, where necessary, to ensure adequate vehicle movement at all times. Overall, this Project will have a beneficial impact on the public safety communication system within Los Angeles County, and is not anticipated to result in significant adverse impacts on infrastructure.

***Socioeconomic Resources***

The Project will help to increase public safety for the local communities by providing a single interoperable communication system that can be operated by all agencies and result in a positive

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effect that extends beyond Los Angeles County. No residents, minority, or low-income populations or businesses will be disproportionately impacted as a result of Project implementation. Overall, this Project is expected to have a positive impact on socioeconomics in the planned service area, and will not result in significant impacts on socioeconomic resources.

***Human Health and Safety***

The Project is not expected to have any adverse impacts on human health and safety during normal operation, but may have minimal, short-term impacts during construction. Several hazardous waste sites have been identified within or near the Project area. Twenty-five LTE sites have been identified with an active leaking underground storage tank (LUST) on file in one or more of the regulatory databases. Eight LTE sites are located within one mile of a facility found on the Superfund Program's National Priorities List (NPL). These eight sites include: Alhambra Police Department (ALHPD01), Glendale Water & Power Utility Operations Center (GDWP001), Los Angeles County Fire Department Camp 2 (LACFCP02), Los Angeles County Fire Station 163 (LACF163), LACF028, Monrovia Fire Station 2 (MRFD002), Industry Sheriff's Station (LASDIDT), and Northeast Area Station (LAPDNED). All of these sites are in various stages of the remediation process and have the potential to directly expose workers to contaminated soil and/or groundwater during excavation activity. To address this potential health hazard the construction contractor is required to prepare a Phase I Environmental Site Assessment to investigate and characterize these 33 LTE sites before construction proceeds. If additional study is warranted, then a Phase II investigation will be conducted to determine levels of contamination. If the Phase II determines that human contact with contaminated soils would occur, then LA-RICS must mitigate safety risks prior to undertaking construction activity. In addition, if dewatering is required during soil excavation, the construction contractor would need to obtain a National Pollutant Discharge Elimination System (NPDES) permit from jurisdictional Regional Water Quality Control Board for surface discharge of groundwater.

All trenching or excavation of foundations and utility connections will be conducted consistent with state and Federal safety rules and regulations, including Occupational Health and Safety Administration (OSHA) regulations. The FAA has purview over promotion of air safety and efficient use of navigable airspace in the United States, which includes evaluating potential obstructions such as communication towers. A total of 129 sites met FAA's obstruction evaluation criteria requiring notification under 14 CFR Part 77 and filing of FAA Form 7460-1, Notice of Proposed Construction or Alteration. FAA has recommended that voluntary notification be made for all proposed LTE antenna structures as best practice and therefore all 231 proposed LTE sites have been submitted to FAA for further review. In addition, the FAA has requested that 1A Level surveys be conducted at each of the four on-airport LTE sites and these surveys are being conducted by LA-RICS. Only those proposed antenna structures that receive "no hazard" to air navigation determinations from the FAA will be constructed.

The Project is not expected to have direct impacts on human health and safety during normal operation. BMPs for workplace safety will be implemented to protect workers and the public within the Project area. LA-RICS will adhere to all federal, state, and county laws, ordinances,

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rules, and regulations that pertain to prevention, pre-suppression, and suppression of fires, and will develop and implement a fire management plan for use during construction activity on those LTE project sites proposed in areas designated as high fire hazard severity zones. Furthermore, LA-RICS will include methane gas collection, ventilation, or other commercially available control measures into the design of the fifteen LTE Project sites located in a Methane Hazard Zone. With implementation of these protection measures, the Project is not expected to have direct impacts on human health and safety during normal operation

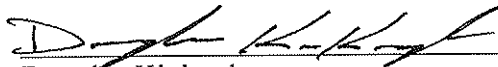
***Cumulative Impacts***

LA-RICS did not identify any significant cumulative impacts that will result from Project implementation. LA-RICS has identified other telecommunication projects that will occur or are proposed at the same Project sites or adjacent to some of the LTE sites. If simultaneous projects do occur, LA-RICS assumes that each of the cumulative projects will be designed and operated in a manner consistent with pertinent land use management plans, as necessary, and comply with federal, state and county requirements, codes and permit conditions to avoid construction conflicts. Although construction at the 231 LTE sites presents some potential for overlap and impact with current built infrastructure and future development, the cumulative impacts from the Project were found negligible and are not expected to exceed the threshold of significance.

**Decision**

Based on the above analysis, NTIA concludes that constructing and operating the Project as defined by the preferred alternative, identified BMPs, CMRs, and mitigation measures, will not require additional mitigation. A separate mitigation plan is not required for the Project. The analyses indicate that the proposed action is not a major Federal action that will significantly affect the quality of the human environment. NTIA has determined that preparation of an EIS is not required.

Issued:



Douglas Kinkoph  
Associate Administrator  
Office of Telecommunications and Information Applications (Acting)  
National Telecommunications and Information Administration

10-15-14  
Date