

Draft Environmental Assessment

# Telecommunication Facility

German Township, Montgomery County, Ohio

*May 2007*



**FEMA**

**U.S. Department of Homeland Security**  
National Preparedness Directorate

**DRAFT ENVIRONMENTAL ASSESMENT**

**TELECOMMUNICATION FACILITY  
GERMAN TOWNSHIP, OHIO**

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## **Appendix A Technical Reports / Documents\***

- 1 - Site Maps and Photographs**
- 2 - NEPA Checklist and Report**
- 3 - Flood Insurance Rate Map**
- 4 - Ohio Department of Natural Resources Response Letter**
- 5 - U.S. Army Corps of Engineers Response Letter**
- 6 - Wetlands Map**
- 7 - U.S. Fish and Wildlife Response Letter**
- 8 - Ohio State Historic Preservation Office Response Letter**
- 9 - Tribal Consultation Documentation**

\* Additional project documentation and reports are available in the FEMA Region 5 office.

## **SECTION ONE: BACKGROUND**

### **1.1 INTRODUCTION**

Funding for this project was awarded to the Ohio Emergency Management Agency (OEMA) under the Department of Homeland Security's (DHS) Homeland Security Grant Program – State Homeland Security Grant Program (SHSGP). The project was authorized by the Montgomery County Office of Emergency Management (MCOEM), who received funding in the amounts of \$1,061,313.39 and \$409,148.00 from OEMA in Fiscal years 2005 and 2006.

In accordance with the National Environmental Policy Act of 1969, the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations [CFR] Parts 1500 through 1508), and DHS' Office of Grants and Training (G&T) policy for NEPA compliance (MD 5100.1), G&T must fully understand and consider the environmental consequences of actions proposed for federal funding. This Environmental Assessment (EA) was prepared in accordance with G&T's responsibilities under NEPA.

### **1.2 PURPOSE AND NEED**

It is MCOEM's objective to have complete radio coverage throughout Montgomery County. In the southwest corner of the county, there are issues related to the loss of radio coverage. Consequently, there is a need to ensure that the public safety telecommunication infrastructure is capable of providing and maintaining radio coverage, especially during an emergency event. Therefore, the specific need addressed in this proposal is that of providing sufficient system capability to achieve radio coverage in the southwest portion of Montgomery County.

## **SECTION TWO: ALTERNATIVES ANALYSIS**

The following alternatives were considered to address the need for radio coverage in the southwest corner of Montgomery County: the No Action alternative; construction of a 300-foot telecommunications tower on the German Township site (Proposed Action); collocation of antennas and radio equipment at either of two existing tower sites; and construction of a shorter tower on the German Township site.

### **2.1 ALTERNATIVES CONSIDERED AND DISMISSED**

An existing telecommunications tower located on Stiver Road, approximately 1-1/2 miles northeast of the proposed project site, was investigated as an action alternative. This alternative would involve collocation of antennas and radio equipment at this existing tower site. During preliminary project investigation, MCOEM learned that German Township had been subjected to legal proceedings

from a property owner regarding consent to allow tower construction. Because of these legal issues, German Township requested that MCOEM pursue other alternatives.

The use of a shorter tower for the antennas was also investigated. However, the coverage analysis provided by Motorola indicated that use of lower antenna heights would likely necessitate construction of multiple infrastructure installations to provide coverage in the southwest corner of the county. Therefore, this alternative was dropped from further consideration.

## **2.2 ALTERNATIVE 1 – NO ACTION ALTERNATIVE**

Under the No Action alternative, MCOEM's public safety radio communications system would not receive a radio coverage upgrade. Analysis by Motorola and MCOEM indicated that under this alternative, the radio coverage issues in the southwest corner of the county would not improve. Consequently, the risk of coverage loss during an emergency event would continue to jeopardize command control, rescue, or event analysis operations.

## **2.3 ALTERNATIVE 2 - CONSTRUCTION OF TELECOMMUNICATION FACILITY AT GERMAN TOWNSHIP SITE (PROPOSED ACTION)**

The proposed project site is located in German Township, approximately two miles west of Germantown, Ohio, and 17 miles southwest of Dayton, Ohio. The site address is 12102 West State Route 725, Germantown, Ohio, 45327. The property is owned by the Trustees of German Township.

The property is currently used by German Township. Property uses include the German Township Trustees office, administration offices, police department, and road services department. The property is also used for the storage of vehicles, maintenance equipment, and bulk aggregates, as a fueling and maintenance station for Township vehicles, as a parking area, and as a general meeting place for the Township. Photographs of pre-construction conditions can be found in Appendix A, Attachment 1.

MCOEM has analyzed the proposed construction of telecommunication infrastructure at the German Township site, including a 300-foot lattice tower, antennas, cabling, fencing, an equipment shelter, a backup generator, and associated electronic equipment, to provide needed radio coverage to its existing public safety radio communications system. MCOEM determined that the proposed German Township tower project would successfully address radio coverage issues.

The galvanized steel tower would include Federal Aviation Administration (FAA) lighting and be capable of loading two six-foot microwave dish antenna and three 800MHz collinear antenna and appropriate antenna cable. A pre-fabricated 12.6-foot by 20-foot equipment shelter would also be located at the site.

The tower and equipment would be located within a 60-foot by 60-foot chain link fence compound, and located on a presently vacant grass-covered area within the Township property. The facility would be accessed through an existing parking lot of the Township administration building, and would not be staffed. Traffic to and from the site would be limited to maintenance activities.

**2.4 ALTERNATIVE 3 – COLLOCATION / ROUTE 4 AND EBY ROAD**

An existing telecommunications tower located near the intersection of Route 4 and Eby Road, approximately 2-1/4 miles southeast of the proposed project site, was investigated as an action alternative. This alternative would involve collocation of antennas and radio equipment at this existing tower site, and construction of a pre-fabricated 12-foot by 20-foot equipment shelter at the site. Because of the lower ground elevation at this site relative to the proposed site, and availability of antenna height on the tower due to existing telecommunication company antennas, the antenna height required to address radio coverage issues was not available. Furthermore, the use of available antenna heights on this tower would necessitate that an additional site be constructed to achieve necessary radio coverage.

**SECTION THREE: AFFECTED ENVIRONMENT AND IMPACTS**

**3.1 PHYSICAL ENVIRONMENT**

The following table summarizes the potential impacts of the Proposed Action Alternative, and identifies conditions or mitigation measures to minimize those impacts, where appropriate. Following the summary table, each environmental area is treated in greater detail.

| Affected Environment            | Impacts  | Mitigation  |
|---------------------------------|--|---|
| Soils                           | Construction activities may cause some disturbance, but effects to soils would be minor and temporary.         | Storm water BMPs utilized during construction.  |
| Seismicity                      | Construction activities may cause some disturbance, but effects to surface water would be minor and temporary. | OBBC Standards Required.  |
| Water Resources & Water Quality | Action is not located in a floodplain.   | Silt fences and storm water BMPs may be implemented to prevent sediment issues.             |
| Floodplain Management           | Construction equipment may temporarily affect air quality; however, no long-term impacts are anticipated.      | Measures to limit emission of fugitive dust, including watering down of construction areas. |
| Air Quality                     |  |   |

|                                   |   |   |
|-----------------------------------|---|---|
| Wetlands                          | Action is not located in or near wetlands.  |   |
| Threatened and Endangered Species | No adverse effects anticipated.   |   |
| Migratory Birds                   | Potential adverse impacts.  | Tower design would be lattice, not guyed, to mitigate collision-related bird mortality; tower would not be located in or near sensitive bird habitat or flyway. |
| Zoning and Land Use               | No adverse effects anticipated.   |   |
| Noise                             | Construction activities may temporarily increase noise levels; however, no long-term effects are anticipated. |   |
| Environmental Justice             | No adverse effects anticipated.   |   |
| Cultural Resources                | No adverse effects anticipated.   | If historic or archaeological materials are discovered during construction, all ground disturbing activities shall cease and FEMA/OHSHPO will be notified.      |

### 3.1.1 Geology, Seismicity and Soils

Executive Order 12699 (Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction) applies as this is a federally assisted project. The proposed equipment shelter as designed by Miller building Systems meets or exceeds seismic code requirements for the project location.

The project site is located at elevation 861' NGVD in an area of rolling hills. According to the United States Department of Agriculture, Soil Conservation Service (SCS) Soil Survey of Montgomery County, Ohio, issued in June 1976, there are two predominant soil types present at the proposed tower site. The north and east portion of the property are classified as type MIB soil, or "Miamian silt loam, 2 to 6 percent slopes." The remainder of the property is classified as MIB2 soil, or "Miamian silt loam, 2 to 6 percent, moderately eroded." Both of these soil types are described as having moderately slow permeability. A copy of the SCS map and soil classification descriptions can be found in the Phase I Environmental Assessment, which is on file in the FEMA Region V office.

A subsurface geotechnical investigation was performed on March 3, 2006, by Noble Engineering Consultants. The subsequent report is on file in the FEMA Region V



office, and includes boring logs for three borings. In general, the subsurface conditions were as follows: topsoil, fill material to a depth of three feet, silty clay to a depth of 13 feet, and clayey silt with wet sand seams to a depth of 40 feet. Tower design provided by Valmont includes five-foot diameter by 35-foot caissons at each tower leg. The shelter foundation design by Nandina includes a 42-inch footing. The site and tower construction documents are on file in the FEMA Region V office.

The Farmland Protection Policy Act (FPPA) (P.L. 97-98, Sec. 1539-1549; 7 U.S.C. 4201, et seq.), which states that federal agencies must “minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses,” was considered in this EA. Prime farmland is characterized as land with the best physical and chemical characteristics for the production of food, feed, forage, fiber and oilseed crops (USDA, 1989). Prime farmland is either used for food or fiber crops or is available for those crops; it is not urban, built-up land, or water areas. The proposed project site is currently a non-agricultural grass-covered area, and was previously the location of an UST soil remediation project. The proposed project site is not considered prime farmland, and therefore FPPA is not applicable.

No Action Alternative - Under the No Action alternative, no impacts to seismicity, geology, or soils would occur.

Proposed Action Alternative - Under the Proposed Action, no impacts to seismicity or geology are anticipated. Construction activities could cause short-term impacts to soils. Appropriate Best Management Practices (BMPs) would be used during the construction phase.

### **3.1.2 Water Resources and Water Quality**

Water resources at the site were investigated as part of the Phase I Environmental Assessment. The project site lies in the Lower Great Miami Watershed (USGS Cataloging Unit: 05080002). The nearest monitored water body is Twin Creek, which flows southwest approximately one mile east of the proposed project site.

The Geotechnical Report provides some indication of groundwater behavior at the site and states, “Groundwater was generally first encountered at about 22 feet to 27 feet below existing grade during the drilling operations. The water encountered is likely from the wet sand seams encountered in the clayey silt stratum. The groundwater measurements varied from 11 feet at 22 hours after completion to 24 feet at 24 hours after completion. The project area had received rainfall shortly before our exploration. The groundwater encountered during and after drilling is likely from perched water within the wet sand seams.” This report is on file in FEMA Region V office.

The Phase I Environmental Assessment includes EDR search data from a search for Federal USGS wells, Federal FRDS Public Water Supply wells, and State wells

within 1 mile of the property. The search revealed four Federal USGS wells within the search radius, include one well of the property: USGS site number 393722084241600. The well was drilled to 188 feet below ground surface in 1977. At that time, the groundwater level was 145 feet below surface. When the groundwater level was tested again in 1993, the ground water level was 107.3 feet below surface.

No Action Alternative - Under the No Action alternative, no impacts to surface or ground water resources would occur.

Proposed Action Alternative - Under the Proposed Action, potential impacts to surface or ground water resources would be minimal, due to the type of activity and the small size of the project area (less than 0.1 acres). A National Pollution Discharge Elimination System (NPDES) permit is not necessary for this project.

### **3.1.3 Floodplain Management (Executive Order 11988)**

Executive Order (EO) 11988 (Floodplain Management) requires federal agencies to take action to minimize occupancy and modification of the floodplain. Specifically, EO 11988 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives.

Flood Insurance Rate Maps (FIRMs) are used to identify the regulatory 100-year floodplain for the National Flood Insurance Program. Consistent with EO 11988, FIRMs were examined during the preparation of this EA. This project is not within the 100-year floodplain as indicated on FIRM panel # 307 for Germantown Village of Montgomery County (see Appendix A, Attachment 3).

### **3.1.4 Air Quality**

The Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The Act established two types of national air quality standards: primary standards set limits to protect public health, including the health of “sensitive” populations such as asthmatics, children, and the elderly, and secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation and buildings. The current criteria pollutants are: Carbon Monoxide (CO), Nitrogen Dioxide (NO<sub>2</sub>), Ozone (O<sub>3</sub>), Lead (Pb), Particulate Matter (PM<sub>10</sub>), and Sulfur Dioxide (SO<sub>2</sub>).

No Action Alternative – Under the No Action alternative, there would be no impacts to air quality because no construction would occur.

Proposed Action Alternative - Under the Proposed Action, there could be short-term minor impacts to air quality during the construction phase due to heavy equipment

use. Measures would be taken to limit emission of fugitive dust, including watering down of construction areas. No long-term impacts to air quality are anticipated.

## **3.2 BIOLOGICAL ENVIRONMENT**

### **3.2.1 Terrestrial and Aquatic Environment**

The proposed project site is currently a vacant, grass-covered area. The property has been previously disturbed by soil remediation activities, and areas immediately adjacent to the proposed tower site are developed and occupied by municipal buildings and equipment. Therefore, the area is considered to have limited value for plant and wildlife species

A formal request was submitted to the Ohio Department of Natural Resources (ODNR) to determine if the proposed project will impact any state Wilderness Areas or Wildlife Preserves.

A response letter, dated October 20, 2005 (see Appendix A, Attachment 4), was received from ODNR, which states "There are no existing or proposed state nature preserves or scenic rivers at the project site. We are also unaware of any unique ecological sites, geological features, breeding or non-breeding animal concentrations, or state parks, forests or wildlife areas within a half mile radius of the project area."

The Department of the Interior, Bureau of Land Management (BLM) maintains all Federal Wilderness Areas. According to the BLM website, BLM does not maintain any wilderness areas within Ohio.

No Action Alternative - Under the No Action alternative, no impacts to terrestrial or aquatic environments would occur.

Proposed Action Alternative - Under the Proposed Action, negligible impacts to the terrestrial and aquatic environment would occur, due to the small size and nature of the project.

### **3.2.2 Wetlands (Executive Order 11990)**

The U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged or filled material into waters of the U.S., including wetlands, pursuant to Section 404 of the Clean Water Act (CWA). Additionally, Executive Order 11990 (Protection of Wetlands) requires federal agencies to avoid, to the extent possible, adverse impact of wetlands.

A formal request was sent to the USACE Louisville District and to the USACE Huntington District to determine if the proposed project would impact any known

wetlands. In a response letter dated December 8, 2005 (Appendix A, Attachment 5), USACE indicated that there would be no apparent impacts to waters of the United States, including jurisdictional wetlands, and that a Department of the Army permit pursuant to Section 404 would not be required for the proposed tower project.

Additionally, the USFWS Wetland Mapper indicates the nearest recorded wetland is 2,000 feet southwest of the project site (across Siegel Road), and no wetland features were noted during the site visits. Lastly, according to the SCS map, the soil type at the proposed project site is Miamian MIB2, which is unsuitable for sustaining wetland plants and wetland wildlife habitats.

No Action Alternative - Under the No Action alternative, no impacts to wetlands would occur.

Proposed Action Alternative - Under the Proposed Action, no impacts to wetlands are anticipated, because the proposed project site is not located in or near a wetland.

### **3.2.3 Threatened and Endangered Species**

In accordance with Section 7 of the Endangered Species Act (ESA) of 1973, the project area was evaluated for the potential occurrences of federally listed threatened and endangered species. The ESA requires any federal agency that funds, authorizes, or carries out an action to ensure that their action is not likely to jeopardize the continued existence of any endangered or threatened species (including plant species) or result in the destruction or adverse modification of designated critical habitats (FEMA 1996).

Formal requests were submitted to the United States Department of the Interior, Fish and Wildlife Service (USFWS) and to the Ohio Department of Natural Resources (ODNR) to determine if the proposed project will impact any Listed Threatened or Endangered Species or Designated Critical Habitats.

In their response letter dated October 20, 2005, ODNR indicated that it did not have any records of rare or endangered species in the Germantown Telecommunication Facility project area. In a response letter dated December 8, 2006 (Appendix A, Attachment 7), USFWS indicated that it appears “unlikely that your project would have significant environmental impacts on the trust resources under our authority.”

No Action Alternative - Under the No Action alternative, no impacts to threatened or endangered species would occur.

Proposed Action Alternative - Under the Proposed Action, no impacts to threatened or endangered species are anticipated.

### **3.2.4 Migratory Birds**

Under the Migratory Bird Treaty Act, taking, killing or possessing migratory birds is unlawful. Migratory birds are a federal trust resource that the USFWS is authorized to protect, and the Service has put forth recommendations for communication tower design and height to mitigate collision-related mortality. The Service recommends that new towers be less than 200 feet tall, without guy wires or lights, because such towers are associated with a lower risk of bird mortality. Taller towers, where practicable, should consider minimizing the use of guy wires and be located outside of sensitive bird habitats and major North American migration flyways to reduce the likelihood for bird collisions.

No Action Alternative - Under the No Action alternative, no impacts to migratory birds would occur.

Proposed Action Alternative - Under the Proposed Action, tower design and location would mitigate collision-related bird mortality. A lattice tower, rather than a guyed tower, would be constructed. There are no sensitive bird habitats present in the project area, and the tower would not be located in a flyway.

## **3.3 SOCIOECONOMICS**

### **3.3.1 Zoning and Land Use**

The project is located in the zoning jurisdiction of German Township, however, it is considered an “essential service” and therefore, exempt from zoning. Supporting documentation is on file in the FEMA Region 5 office.

### **3.3.2 Noise**

Noise is generally defined as unwanted sound. Sound is most commonly measured in decibels (dB) on the A-weighted scale, which is the scale most similar to the range of sounds that the human ear can hear. The Day-Night Average Sound Level (DNL) is an average measure of sound. The DNL descriptor is accepted by federal agencies as a standard for estimating sound impacts and establishing guidelines for compatible land uses. EPA guidelines, and those of many other federal agencies, state that outdoor sound levels in excess of 55 dB DNL are “normally unacceptable” for noise-sensitive land uses such as residences, schools, or hospitals.

No Action Alternative - Under the No Action alternative, no impacts to noise would occur.

Proposed Action Alternative - Under the Proposed Action, temporary short-term increases in noise levels are anticipated due to construction activities and the use of

heavy equipment. The proposed project does not readily create noise, except for exterior HVAC equipment cooling units for the shelter and occasional backup power generator activation. There do not appear to be any noise sensitive land uses within the area of potential effect.

### **3.3.3 Environmental Justice (Executive Order 12898)**

Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) mandates that federal agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations.

No Action Alternative – Under the No Action Alternative, there would be no disproportionately high and adverse effects on minority or low-income populations. All populations could potentially be adversely affected by a loss of radio coverage during an emergency.

Proposed Action – Under the Proposed Action, no disproportionately high and adverse impacts on minority or low-income populations are anticipated. The radio coverage upgrade would benefit all populations by improving communication related to public safety.

## **3.4 CULTURAL RESOURCES**

In addition to review under NEPA, consideration of impacts to cultural resources is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR Part 800. Requirements include identification of significant historic properties that may be impacted by the Proposed Action. Historic properties are defined as archaeological sites, standing structures, or other historic resources listed in or eligible for listing in the National Register of Historic Places (NRHP).

As defined in 36 CFR Part 800.16(d), the Area of Potential Effect (APE), “is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist.”

### **3.4.1 Historic and Archaeological Resources**

The proposed project site is a former soil remediation site where activities included tilling. Because of the disturbed nature of the project site, no archeological field work was required. Section 106 consultation was initiated with the Ohio State Historic Preservation Office (SHPO), who was asked to review the proposed project. Although several historic properties eligible for listing on the NRHP were identified

within the APE, the Ohio SHPO, in a letter dated July 6, 2006, determined that construction of a telecommunications facility would not adversely affect these properties.

The Ohio SHPO indicated that while the proposed tower may be visible from some properties listed on or eligible for listing on the NRHP, it would not affect their historic setting because of distance, topography, and mature woodlots in the area. The tower would be shielded from locations greater than 500 feet in many directions because of foliage. Documentation of this Section 106 consultation is provided in Appendix A, Attachment 8.

No Action Alternative - Under the No Action Alternative, no impacts to cultural resources would occur.

Proposed Action Alternative - Under the Proposed Action, no impacts to cultural resources are anticipated. If historic or archaeological materials are discovered during construction, all ground disturbing activities shall cease and FEMA/OHSHPO will be notified.

### **3.4.2 Indian Coordination and Religious Sites**

Section 106 of the NHPA requires consultation with Federally-recognized Indian tribes who may have potential cultural interests in the project area, and acknowledges that tribes may have interests in geographic locations other than their seat of government. A voluntary email system known as the Federal Communications Commission's Tower Construction Notification System (TCNS) was used to notify several tribes of the proposed German Township telecommunications facility. None of these tribes expressed objection to the proposed project. A summary of tribal consultation and copies of TCNS correspondence are provided in Appendix A, Attachment 9.

No Action Alternative - Under the No Action Alternative, no impacts to Indian religious or archaeological sites would occur.

Proposed Action Alternative - Under the Proposed Action, no impacts to Indian religious or archaeological sites are anticipated.

## **SECTION FOUR: CUMULATIVE IMPACTS**

Cumulative impacts are those effects on the environment that result from the incremental effect of an action when added to past, present and reasonably foreseeable future actions, regardless of what agency (federal or nonfederal) or person undertakes such other actions. Cumulative effects can result from

individually minor but collectively significant actions taking place over a period of time.

There are no known on-going or planned projects in the vicinity of the proposed project site. Therefore, no cumulative impacts are anticipated.

## **SECTION FIVE: PUBLIC PARTICIPATION**

A Public Hearing regarding the proposed project was advertised in the April 6, 2006 and April 13, 2006 editions of the Germantown Press. The German Township Board of Trustees and the Montgomery County Sheriff Office held the hearing on April 17, 2006 at the German Township Hall. There was no opposition from the residents who attended, and the Township Trustees voted unanimously in favor of permitting the telecommunication facility to be constructed.

German Township will notify the public of the availability of the draft Environmental Assessment (EA) through the publication of a public notice in a local newspaper. The draft EA will also be available on the Federal Emergency Management Agency's (FEMA) Environmental and Historic Preservation website at <http://www.fema.gov/plan/ehp/envdocuments/ea-region5.shtm>

## **SECTION SIX: MITIGATION MEASURES AND PERMITS**

In accordance with applicable local, state, and federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site, including any that might be required by the FAA.

The proposed project requires a building permit from Montgomery County, which was received on July 27, 2006.

As previously mentioned, under the Proposed Action, a lattice tower structure rather than a guyed tower would be constructed. This design would mitigate collision-related bird mortality.

## **SECTION SEVEN: CONSULTATIONS AND REFERENCES**

The following agencies and organizations were contacted and asked to comment on the proposed project. Responses received are included in Appendix A.

- Ohio Department of Natural Resources
- Ohio Historic Preservation Office
- U.S. Fish and Wildlife Service



- U.S. Army Corps of Engineers
- Federal Communications Commission
- Interested Indian tribes

## **SECTION EIGHT: CONCLUSION**

No impacts to geology, floodplains, wetlands, socioeconomic resources, environmental justice, or cultural resources are anticipated under the Proposed Action. During the construction period, there are potential short-term and minor impacts to soils, surface water, air quality, and noise. All short-term impacts require conditions to minimize and mitigate impacts to the proposed project site and surrounding areas. The proposed 300-foot telecommunications tower could have potential adverse impacts on migratory birds. However, the tower's lattice design and its location outside of sensitive habitats and flyways would mitigate collision-related bird mortality.

## **SECTION NINE: LIST OF PREPARERS**

This EA was prepared by Lance H. Francis, P.E., S.E., Principal, Nandina, Inc.