

**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**

May 2019

Summary

The National Telecommunications Information Administration (NTIA) is issuing this Finding of No Significant Impact (FONSI) to reflect project additions, changes, and validations that were documented and analyzed in the Broadband Technology Opportunities Program (BTOP) Final Third Supplemental Los Angeles Regional Interoperable Communication System Joint Powers Authority (LA-RICS) Long Term Evolution (LTE) System Environmental Assessment (SEA3). This FONSI is effective as of May 14, 2019, and supersedes the Revised FONSI issued September 2, 2015.

The LA-RICS applied to the Broadband Technology Opportunities Program (BTOP) for a grant to construct a 700 MHz LTE wireless broadband communications network, consisting of 231 existing telecommunications sites. The LA-RICS previously evaluated project components in the Final LA-RICS LTE System Environmental Assessment (EA), dated October 14, 2014, the Final First Supplemental LA-RICS LTE System EA (SEA1), dated July 9, 2015, and the Final Second Supplemental LA-RICS LTE System EA (SEA2), dated August 7, 2015. The Final LA-RICS LTE EA, SEA1, and SEA2 discussed construction of LTE facilities for wireless voice and data communications in the Los Angeles County area. The U.S. Department of Commerce (USDOC), National Telecommunications and Information Administration (NTIA) initially issued a FONSI on October 15, 2014, with revised FONSI issued on July 10, 2015 for SEA1 and on August 11, 2015 for SEA2. A revised FONSI was issued on September 2, 2015 to reflect resumption of construction at one additional LTE site (Site LAPDPAC).

Under NTIA's conditional approval for the LA-RICS LTE Project in the previous FONSI, issued September 2, 2015, construction has been completed at 63 permanent sites and 13 cell-on-wheels (COW) sites. Those 76 LA-RICS sites are now operational and are currently being migrated since being absorbed into the Nationwide Public Safety Broadband Network (NPSBN) and transferred to the AT&T Corporation (AT&T). AT&T is implementing the NPSBN under contract to the First Responder Network Authority (FirstNet Authority), an independent authority within the USDOC. The mission of FirstNet is to develop, build, and operate the nationwide, broadband network that equips first responders to save lives and protect U.S. communities. The NPSBN is the first high speed, nationwide interoperable wireless broadband communications network dedicated to public safety, saving lives, and protecting communities in the United States.

The LA-RICS LTE project is being developed under the American Recovery and Reinvestment Act (ARRA)-funded BTOP grant administered by NTIA. The BTOP grant originally expired on September 30, 2015; however, the funding deadline for the LA-RICS LTE Project was extended

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to September 30, 2020, through the Continuing Appropriations Resolution Act of 2016, which was signed by the President on September 30, 2015. As a result of this law, LA-RICS proposed for re-initiation of the LA-RICS LTE project; and, to that end, the LA-RICS Joint Powers Authority (Authority) submitted its Phase 2 Project Implementation Plan to NTIA for consideration in 2016. NTIA approved portions of this plan in June 2018, authorizing the covering of augmentation (i.e., design and planning for and construction of additional sites that should eventually be included in the NPSBN). NTIA extended LA-RICS LTE project to June 30, 2020. Fifteen sites were analyzed in SEA3 as part of the Proposed Action.

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 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 Proposed Action will not have a significant impact on the environment, and issue a 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.

The Proposed Action includes:

- Development at two sites (sites IGPD and UCLA2) involving LTE panel antennas being mounted to the roof or roof parapet of an existing building;
- Development at two sites (sites MVS2 and POLB1) involving mounting LTE antennas on an existing lattice tower, also known as collocation; and
- Development at 11 sites (sites AZUCYN, IRWDPD, SCEDUN, SCEELAKE, SCEGAL, SCEMERC2, SCENOLA, SCEPLM, SCESTUD2, SCETEL, and THOMSEN) involving construction of new monopoles for use as antenna support structures.

Based on a review of the analysis in the EA and supplemental documentation, NTIA has determined that the Proposed Action, implemented in accordance with the preferred alternative, and incorporating best management practices (BMPs), construction management requirements (CMRs), and mitigation measures, 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, which is effective May 14, 2019.

Additional information and copies of the Executive Summary of SEA3 and FONSI are available to all interested persons and the public through the BTOP website (www2.ntia.doc.gov) and the following contact:

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Aimee Meacham
Director, Policy and Compliance
Broadband Technology Opportunities Program
National Telecommunications and Information Administration
U.S. Department of Commerce
H.C. Hoover Bldg. Room 4878
1401 Constitution Avenue, NW
Washington, DC 20230
Tel. 202-482-5820
Email: ameacham@ntia.gov

Purpose and Need

The purpose of this action is to develop and improve sites and improve LA-RICS LTE coverage to better provide dedicated, interoperable broadband communications capability and capacity to enhance first and second responder public safety services in underserved areas throughout Los Angeles County. As the LA-RICS LTE design has progressed, new features, including design and geographic changes, have been identified to improve upon the design (i.e., the structural integrity of a site) and optimize broadband coverage and capacity. Additionally, some sites in the original 231-site design were dropped from the legacy LA-RICSLTE due to engineering or public policy decisions affecting these individual sites, leaving some areas in Los Angeles County underserved. Action is needed to provide or improve LTE coverage in underserved areas in Los Angeles County. Action is also needed to improve on previous design at prior-developed sites.

Proposed Action Description

The Proposed Action includes development of 15 LTE sites. Eleven of these are new sites (sites AZUCYN, IGPD, POLB1, SCEDUN, SCEELAKE, SCEGAL, SCENOLA, SCEPLM, SCETEL, THOMSEN, and UCLA2). One site (site IRWDPD) included in SEA3 was previously analyzed under the Final LA-RICS LTE EA, but was not included in the 76 sites previously built, nor was it included in the August 11, 2015 FONSI. Three sites (sites MVS2, SCEMERC2, and SCESTUD2) included in SEA3 were previously analyzed under SEA2, but the design has changed such that new analysis is warranted.

The type of construction associated with each of the 15 sites in SEA3 is listed in Table 1 and summarized below.

- Development at two sites (sites IGPD and UCLA2) would involve LTE panel antennas being mounted to the roof or roof parapet of an existing building.
- Development at two sites (sites MVS2 and POLB1) would involve mounting LTE antennas on an existing lattice tower, also known as collocation.

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- Development at 11 sites (sites AZUCYN, IRWDPD, SCEDUN, SCEELAKE, SCEGAL, SCEMERC2, SCENOLA, SCEPLM, SCESTUD2, SCETEL, and THOMSEN) would involve construction of new monopoles for use as antenna support structures.

Table 1. LA-RICS Proposed Action Summary for the 15 LTE Sites

LA-RICS Project Site Name	Site Name	Address	City	Construction Type
AZUCYN	Azusa Canyon	2000 San Gabriel Canyon Rd.	Azusa	New 70' Monopole
IGPD	Inglewood Police Station	1 W. Manchester Blvd.	Inglewood	Building Mount
IRWDPD	Irwindale Police Department	5050 Irwindale Ave.	Irwindale	New 70' Monopole
MVS2	Monte Vista Star Center-2	11515 Colima Rd.	South Whittier (Unincorporated)	Collocation
POLB1	Port of Long Beach Harbor Plaza	Harbor Plaza	Long Beach	Collocation
SCEDUN	SCE Dunlap Crossing	Dunlap Crossing Rd.	Pico Rivera	New 70' Monopole
SCEELAKE	SCE Elizabeth Lake Substation	Ridge Route Rd.	Castaic (Unincorporated)	New 70' Monopole
SCEGAL	SCE Gallatin Substation	8823 Manzanar Ave.	Downey	New 70' Monopole
SCEMERC2	SCE Merced Substation-2	1408 S. Azusa Ave.	West Covina	New 70' Monopole
SCENOLA	SCE Nola Substation	18901 S. Main St.	Carson	New 70' Monopole
SCEPLM	SCE Palmdale Substation	40th St. E and E Ave. R-8	Palmdale	New 70' Monopole
SCESTUD2	SCE Studebaker Self-Storage-2	698 Studebaker Rd.	Long Beach	New 70' Monopole
SCETEL	SCE Telegraph Substation	15832 Lambert Rd.	Whittier	New 70' Monopole
THOMSEN	Thomsen Communication Site	29546 Sand Canyon Road	Canyon Country (Unincorporated)	New 70' Monopole
UCLA2	UCLA (Factor Building)-2	700 Tiverton Ave.	Los Angeles	Building Mount

The Proposed Action includes three sites (sites MVS2, SCEMERC2 and SCESTUD2) where LTE equipment was deployed previously using COWs as part of the original 76-site legacy LA-RICS LTE. These sites were previously analyzed in SEA2 and approved for deployment in the previous FONSI where they were previously designated as sites LASDMVS, SCEMERC, and SCESTUD, respectively. Under the Proposed Action, Site MVS2 would be improved by adding LTE equipment to an existing 120-foot tower on site that was recently built as part of the

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separate LA-RICS Land Mobile Radio (LMR) Project. At sites SCEMERC2 and SCESTUD2, construction of new monopoles is proposed. At all three sites, the existing COW-based LTE equipment would be removed by AT&T for deployment elsewhere within the NPSBN.

All 15 sites considered in the Proposed Action would be located within Los Angeles County. The sites will be constructed using a set of CMRs designed to avoid or minimize impacts at LTE sites. These CMRs are integral to the project, are incorporated into the detailed project design, and are enforceable by the Authority through the contract provisions. No permanent acquisition or change of ownership would be required at any site.

New self-supporting monopoles will be installed at 11 sites (sites AZUCYN, IRWDPD, SCEDUN, SCEELAKE, SCEGAL, SCEMERC2, SCENOLA, SCEPLM, SCESTUD2, SCETEL, and THOMSEN). The heights of the new monopoles will be 70 feet above ground level. Maximum diameter of the base of the monopoles will be 7 feet. Lightning rods up to 25-foot long will be affixed to the apex of each new monopole, resulting in a maximum tower height of 95 feet above ground level (AGL). Soil excavation for installation of the monopoles will be approximately 7 feet in diameter and up to 36 feet deep. At sites SCEMERC2 and SCESTUD2, the existing COW-based LTE equipment would be removed by AT&T for deployment elsewhere within the NPSBN.

At two sites (sites IGPD and UCLA2), LTE antennas will be mounted to existing rooftop structures, typically using a sled mount design or mounted to a roof parapet. The proposed support structure at Site IGPD is the Inglewood City Hall, an eight-story structure constructed in 1975. The proposed support structure at Site UCLA2 is the Factor Building, a 17-story structure constructed in 1981. No ground disturbance would occur at these sites.

The remaining two sites are the "collocation" facilities, which are existing towers 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. The existing tower at Site MVS2 is 120 feet AGL, and the existing tower at Site POLB1 is 110 feet AGL. At Site MVS2 the existing COW-based LTE equipment would be removed from the site and re-deployed by AT&T for use within the NPSBN.

Up to six outdoor equipment cabinets would be included at each of the 15 LTE sites included in the Proposed Action. Standard cabinets under the Proposed Action in SEA3 would be approximately 30 inches wide by 30 inches deep by up to 5 feet high, generally configured to be mounted on an up to 162-square-foot concrete slab that is up to 12 inches thick; except at sites IGPD and UCLA2, where rooftop installation would occur with equipment mounted either on the roof or within the interior of each building. Cabinets would be used to house broadband radio base stations (known as an eNodeB), backup batteries, and microwave backhaul equipment. If space is available, the equipment cabinets could be collocated with emergency backup generators on a larger pad foundation to combine the two assets. Each cabinet would be equipped

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with a service light, designed to minimize light exposure to areas not immediately adjacent to each cabinet.

If emergency backup power is not available on site, generators would be installed at each of the 15 LTE sites in the Proposed Action to provide backup power for up to approximately two weeks in the event of outages. Proposed new generators would be up to 35 kilowatts (kW), as analyzed previously. Diesel fuel would be supplied from an integrated double-walled sub-base fuel tank or separate fuel tank (up to 300 gallons) meeting or exceeding industry standards. Except at sites IGPD and UCLA2 which would use existing emergency backup power provided at each building, each generator and fuel tank would be sited on a concrete pad(s) measuring up to approximately 144 square feet by 12 inches thick. This infrastructure could be collocated on the concrete pads holding equipment cabinets as described above.

For sites where a monopole tower is proposed, underground conduit will be installed in a trench measuring up to 2 feet wide by up to 4 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 occur only in previously disturbed or developed designated work areas. For sites IGPD and UCLA2, electric connection will be made via electrical metallic conduits surface-mounted to the roof or through existing cable pathways in the building.

Up to 800 square feet of new impervious surfaces may be installed at each Proposed Action site (except for sites IGPD and UCLA2 as described below) for monopole installation and/or pad foundations for the equipment cabinets, emergency generator, fuel tank, or fence foundations. Up to 3,600 square feet of ground disturbance will be required at each proposed site to install LTE system equipment, monopole towers, ancillary components, and cables, except at sites IGPD and UCLA2 where no ground disturbance would occur, and at Site THOMSEN, where ground disturbance could reach 10,000 square feet because of an extended power and/or fiber run in the public right of way (i.e., along Sand Canyon Road) to the point of interconnection for these utilities. 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. No new disturbance will occur for storage of equipment or material at any site. No road improvements or construction are planned.

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. Construction at all LA-RICS LTE sites will comply with the applicable building codes and property owner requirements. 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.

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Alternatives

The SEA3 includes an analysis of the alternatives for implementing the Proposed Action 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 SEA3.

Preferred Alternative. This alternative involves the Proposed Action as discussed above.

No Action Alternative. No action was also considered. Under the No Action Alternative, no additional sites would be constructed. In the local areas that would be served by these sites under the Proposed Action, law enforcement and fire service agencies within Los Angeles County would receive little or no dedicated public safety broadband communications capacity and/or coverage compared to surrounding areas where LTE sites have been constructed. The areas that might be served by expanded LTE technology for the first and second responders 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 No Action Alternative was analyzed in the SEA3 to comply with NEPA requirements and serve as a baseline for comparison of impacts associated with the Proposed Action.

Alternatives Considered But Not Carried Forward. In addition to the Preferred Alternative, LA-RICS considered three alternatives as part of the Final LA-RICS LTE EA: collocation for all 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 SEA3.

Findings and Conclusions

The SEA3 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

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Cultural Resources, Aesthetic and Visual Resources, Land Use, Infrastructure, Socioeconomic Resources, and Human Health and Safety. Cumulative impacts were also evaluated.

Noise

The Proposed Action 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 and there are few sensitive noise receptors near the LTE sites. 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 Proposed Action construction 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 South Coast Air Basin and Mojave Desert Air Basin are expected. The Proposed Action 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 Proposed Action will result in the release of approximately 8,070.3 metric tons of carbon dioxide equivalent emissions over the life of the project. Thus, GHG emissions are expected to be well under the Council on Environmental Quality's presumptive annual effects threshold of 25,000 metric tons of carbon dioxide equivalent emissions and the South Coast Air Quality Management District's interim significance threshold of 10,000 metric tons of carbon dioxide equivalent emissions to trigger reporting for stationary sources. 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 as a result of Proposed Action construction and operation.

Geology and Soils

All 15 sites included in the Proposed Action have a risk for impacts from seismic activities that may include structural damage to equipment, buildings, and monopoles and disruption of LTE function. One LTE site, Inglewood Police Station (IGPD), is located within an Alquist-Priolo Earthquake Fault Zone. Implementation of the LTE system at this site is necessary to provide coverage for Los Angeles County and because other potential nearby sites would not meet the necessary criteria for site selection. The construction type at this site is a roof mount, and the underlying Inglewood City Hall structure was built in 1975 and is required to have met all earthquake safety requirements in effect. Compliance with Los Angeles County building code standards and permit requirements will ensure that Site IGPD and the other 14 LTE sites are constructed to avoid hazards from earthquakes. With implementation of these requirements, no significant impact due to seismic hazards is anticipated.

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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 LTE monopole sites will require underground conduit to be placed in a trench measuring 2 feet wide by 4 feet deep. 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. Up to 800 square feet of new impervious surfaces may be installed at each Proposed Action site (except for sites IGPD and UCLA2 as described below) for monopole installation and/or pad foundations for the equipment cabinets, emergency generator, fuel tank, or fence foundations. At each Proposed Action site, up to 3,600 square feet of temporary ground disturbance may occur, except at sites IGPD and UCLA2 where no ground disturbance would occur, and at Site THOMSEN, where ground disturbance could reach 10,000 square feet because of an extended power and/or fiber run in the public right of way (i.e., along Sand Canyon Road) to the point of interconnection for these utilities. Overall, ground disturbance is expected to be minor and the Proposed Action 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 the Proposed Action.

Water Resources

Surface water, including streams and wetland features, are not present within the Proposed Action boundaries for any of the 15 LTE sites. LA-RICS will ensure best practices during 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 and non-storm water runoff associated with construction according to protocols established by the California Stormwater Quality Association (CASQA). Furthermore, the Proposed Action 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. None of the sites are located 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. Water used during construction will either come from existing water connections located at/near the LTE sites or will be transported to the sites where existing plumbing connections might not be available. The Proposed Action 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 Proposed Action will have no significant impacts on water resources.

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Biological Resources

LA-RICS collected preliminary background information on threatened and endangered species within the Proposed Action 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, and critical habitat. In addition, a reconnaissance field survey was conducted for each LTE 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, three Federal threatened, endangered, or candidate species were identified as potentially occurring in the Proposed Action area. No critical habitat for these species is located within the Proposed Action areas. These species are identified in the *Biological Assessment – Supplemental 2 LA-RICS Long-Term Evolution Project* report (Jacobs, January 2019).

On January 31, 2019, NTIA entered into informal consultation with the USFWS regarding potential significant impacts to federally listed threatened and endangered species from Proposed Action activities on the southwestern willow flycatcher (*Empidonax traillii extimus*), least Bell's Vireo (*Vireo bellii pusillus*), and coastal California gnatcatcher (*Polioptila californica californica*). A Biological Assessment was submitted to the USFWS on January 31, 2019. In letters dated February 28, 2019, the USFWS concurred with NTIA's determination that the Proposed Action may affect, but is not likely to adversely affect the southwestern willow flycatcher (*Empidonax traillii extimus*), least Bell's Vireo (*Vireo bellii pusillus*), and coastal California gnatcatcher (*Polioptila californica californica*), 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 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 Proposed Action may temporarily affect wildlife, including migratory birds. Should active bird nests be identified at any of the LTE sites in the Proposed Action, 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 invertebrates, amphibians and reptiles, birds, and mammals,

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were also identified for specific protection through employment of CMRs. The short-term presence of construction vehicles, equipment, and crews may also result in temporary noise and visual impacts to species. Direct and indirect impacts to these species will be minimized through the implementation of CMRs.

Ground disturbance at the 15 LTE sites associated with the Proposed Action would be less than 1.4 acres for all sites, consisting of previously disturbed or developed lands. The site selection process avoided locations where Proposed Action activities could have significant impacts on biological resources. Further, because of the Proposed Action site selection process and project CMRs, only existing human-altered areas would be available for use as a work area during construction. In addition, several CMRs were specifically designed to prevent or eliminate impacts such as direct mortality or damage to plants or disturbance of substrate supporting vegetation at work areas during and after the construction at each of the proposed LTE sites. Operations activities associated with the Proposed Action would require use of only existing developed areas for occasional repair and maintenance activities; therefore, no significant impacts to vegetation would result.

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 D of the SEA3. 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.

Historic and Cultural Resources

On December 4, 2019, NTIA provided information about the Proposed Action, a description of the direct and indirect areas of potential affect, maps, photos, and descriptions of any historic properties identified and evaluation efforts, through the Federal Communication Commission's (FCC) Tower Construction Notification System (TCNS), to nine federally recognized tribes interested in the Proposed Action's geographical location in California. Consultation was completed on February 15, 2019 with no additional requests for information nor information regarding additional tribal resources was received; however, several tribes requested that if cultural resources are inadvertently identified during construction that the tribes are contacted for further consultation regarding the discovery.

In addition, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed on November 5, 2018 to determine if sacred lands or other resources

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of significance to the Native American community were known to exist in proximity to the Proposed Action. No additional tribal resources were identified as part of this record search; however, NAHC provided additional contact information for California non-federally recognized tribes/groups potentially interested in the Proposed Action areas. These tribes/groups were contacted and no information regarding additional tribal resources was received.

As part of local government outreach, various municipalities were also contacted for the LTE sites on November 2, 2018. Some additional information regarding historic structures was provided and incorporated as part of the cultural resources review and analysis, as applicable with regard to the areas of impact.

In a submittal dated February 18, 2019, NTIA initiated consultation with the California State Historic Preservation Officer (SHPO) for the Proposed Action. This submittal included detailed information about the Proposed Action, a description of the direct and indirect areas of potential affect, maps, photos, descriptions of any historic properties identified and evaluation efforts, tribal and public consultation efforts and results, and determinations of effects for each LTE site.

No National Register of Historic Places (NRHP)-listed or -eligible prehistoric or historic archaeological resources were identified within the direct areas of potential effect at any of the LTE sites. If prehistoric or historic archaeological materials, particularly human remains, are discovered during construction activities, to prevent significant impacts all ground-disturbing activities would cease in the vicinity of the find and the appropriate Cultural Resource Management (CRM) CMRs followed. NRHP-listed or -eligible archaeological resources were identified at two sites within the indirect areas of potential effect. Based on previous disturbance or minimal visual effects, it was determined that there would not be adverse effects to these archaeological resources. SHPO concurred with this determination by letters on March 28, 2019.

No National Register of Historic Places (NRHP)-listed or -eligible historic architectural resources were identified within the direct areas of potential effect at any of the LTE sites. NRHP-listed or -eligible historic architectural resources were identified at five sites within the indirect areas of potential effect. Based on existing visual disturbances and/or overall minimal visual effects, it was determined that there would not be adverse effects to these historic architectural resources. SHPO concurred with this determination by letters on March 26 and March 28, 2019.

Aesthetic and Visual Resources

The planned telecommunications network will include new towers and wireless network equipment on existing towers and buildings, which are located 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 the Proposed Action will be up to 95-foot high (including a 25-foot lightning rod), self-supporting, and free of guy wires to minimize potential visual impacts. The towers, antennas, and equipment

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buildings are expected to blend in with existing development, other towers and structures, and/or the surrounding environment. Additionally, none of the sites carries any special visual resource protection designation (e.g., federally administered land, tribal land, coastal zone, or state-designated scenic highway).

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

Land Use

Construction and operation under the Proposed Action would not conflict with applicable land use plans. None of the proposed sites lies on federally administered land, tribal land, or within the boundary of an existing airport land use plan (ALUP); therefore, these types of land use plans are not applicable to the analysis.

All 15 sites have been previously developed. Nine sites (sites AZUCYN, SCEDUN, SCEELAKE, SCEGAL, SCEMERC2, SCENOLA, SCEPLM, SCESTUD2, and SCETEL) contain utility uses such as municipal water tanks or large-scale electrical infrastructure that are not inconsistent with the proposed use described for each of these sites, and three of these sites (sites AZUCYN, SCEMERC2, and SCESTUD2) contain existing telecommunications infrastructure. Three sites (sites IGPD, IRWDPD, and MVS2) are currently occupied by a police station or Sheriff's facility that already includes telecommunications infrastructure. Two sites (sites POLB1 and UCLA2) are publicly owned infrastructure that has existing telecommunications equipment installed, and the current uses are consistent with those described for the Proposed Action. One site (THOMSEN) is designated as residential/heavy agriculture, which allows installation of telecommunications infrastructure; the site already contains an existing monopole structure and supporting infrastructure. The uses described under the Proposed Action at all 15 sites is not inconsistent with existing uses, land use plans, or current zoning at these sites.

Only one site (POLB1) lies within the South Coast Area of the California coastal zone. Coastal permitting for the Port of Long Beach (POLB) is governed by the POLB Port Master Plan. Consistency with land use will be determined in the Harbor Development Permit process, which may be applicable at Site POLB1. No changes to land use at the existing tower at POLB1 are proposed and the proposed use is consistent with the intended purpose of this existing tower site. The addition of new antennas, equipment cabinets, generator, fuel tank, and fencing do not appear to be inconsistent with Goal 2 of the 1990 Port Master Plan, "Encourage Maximum Use of Facilities" or Goal 5 is "Develop Land for Primary Port Facilities and Port Related Uses". Any inconsistency with current land use would be addressed during any required acquisition of

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and compliance with a Harbor Development Permit and would be accomplished prior to construction. No significant short- or long-term impacts to land use would occur at Site POLB1.

No conflicts with existing use, land use plans, or zoning ordinances were identified with any site in the Proposed Action. As development of each of the sites would be consistent with local agency plans under the Proposed Action, no significant short- or long-term direct or indirect impacts are anticipated on land use.

Infrastructure

Site constraints associated with underground pipelines, communication cables, and similar urban infrastructure may occur within 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 LTE towers, 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, the Proposed Action 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 Proposed Action 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 effect that extends beyond Los Angeles County. No residents, minority, or low-income populations or businesses (i.e. Environmental justice populations) will be disproportionately impacted as a result of project implementation. Overall, the Proposed Action is expected to have a positive impact on socioeconomic in the planned service area, and will not result in significant impacts on socioeconomic resources.

Human Health and Safety

The Proposed Action 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 Proposed Action sites. Eleven LTE sites have been identified within 0.5 miles of an underground storage tank (UST), leaking UST (LUST), landfill, and/or oil well on file in one or more of the regulatory databases. The locations of the hazards are known and will not be encountered. Additionally, there are no indications that potentially residual impacted soil from the hazards extends to within the planned site boundary or will be impacted by construction. One site (IRWDPD) is located within a site found on the Superfund Program's National Priorities List (NPL). Planned construction activities are likely to encounter groundwater. Potentially contaminated groundwater could be encountered at depths as

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shallow as 10 feet. Prior to excavation, a Dewatering Permit will be obtained from the Los Angeles Regional Water Quality Control Board. Planned construction activities that encounter groundwater will require appropriate National Pollutant Discharge Elimination System (NPDES) permitting from jurisdictional Regional Water Quality Control Board to manage extracted groundwater and may include water testing and disposal to a licensed facility if needed. All activities will be performed in accordance with applicable permit conditions. No significant direct or indirect impacts from hazardous materials are expected.

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 Federal Aviation Administration (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. None of the 15 LTE sites meet 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 LTE sites have been submitted to FAA for further review. This hazard determination review is ongoing and will be completed prior to construction. Development of infrastructure at all sites would occur in compliance with all stipulated conditions in the corresponding FAA Hazard Determination to preclude hazards to air navigation. Because any new tower construction would be required to comply with applicable FAA and FCC regulations, no significant direct or indirect impacts to air navigation are anticipated.

The Proposed Action 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 Proposed Action areas. LA-RICS will adhere to all Federal, State, and county laws, ordinances, 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 sites proposed in areas designated as high fire hazard severity zones.

Two sites (IRWDPD and POLB1) have the potential to create an exposure to methane due to their proximity to an oil well or landfill that may produce methane. Ground disturbance at IRWDPD includes drilling for monopole installation; grading for and installation of cabinets, generator and fuel tank; trenching for power; wall and fencing construction; and placement of grounding equipment. At POLB1 the work would not involve monopole installation but would otherwise be similar to that described for IRWDPD. Since no occupied structures would be built at these sites, methane, if present, would have no potential pathway to migrate from the subsurface and accumulate within an occupied structure at these sites. None of the remaining 13 LTE sites are located within 200 feet of an oil well or within 1,000 feet of a landfill. No significant direct or indirect impacts from methane gas would be expected to occur.

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Radio frequency (RF) modeling for the 15 LTE sites was conducted to estimate the worst-case power density at the site ground-level resulting from operation of the proposed antennas to account for public and worker safety. Based on the results of the modeling for RF exposures at the 15 LTE sites, no significant direct or indirect impacts due to RF exposure are anticipated.

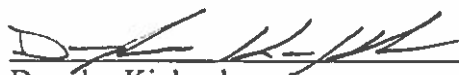
Cumulative Impacts

LA-RICS did not identify any significant cumulative impacts that will result from the implementation of the Proposed Action. LA-RICS did not identify any other electrical transmission or telecommunication projects that were in-progress, pending, or reasonably foreseeable within 0.5 miles of each LTE site. Regardless, if simultaneous projects do occur at some point in the future, NTIA 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 15 LTE sites could present some potential for overlap and impact with current built infrastructure and future development, the cumulative impacts from the Proposed Action 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 Proposed Action 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 Proposed Action. 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
National Telecommunications and Information Administration

5-15-19
Date

Special Award Condition
Compliance with Environmental Protocols and Measures

**Broadband Technology Opportunities Program Grant
Los Angeles Regional Interoperable Communication System Joint Powers Authority
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MAY 2019

This BTOP Grant Special Award Condition establishes requirements applicable to implementation of the Los Angeles Regional Interoperable Communication System Joint Powers Authority (LA-RICS) Long Term Evolution Project. The funding of the Grant is dependent on compliance with the provisions of this Special Award Condition (SAC). This SAC is based on the Final Environmental Assessment (EA), Supplemental EA #1 (SEA1), Supplemental EA #2 (SEA2), and Supplemental EA #3 (SEA3) documentation and supersedes the previous SAC issued September 2, 2015.

Post-award environmental reviews of the Proposed Action included consultation with regulatory agencies related to the protection of biological and historic and cultural resources. These consultations identified specific protocols or environmental protection measures. These protocols or protective measures may be either required or recommended to be included in the implementation of the Proposed Action to minimize potential impacts to biological resources and effects on historic and cultural resources. The protocols and measures are listed below.

Note that this SAC does not distinguish requirements identified during the consultations from recommendations that were also provided. The LA-RICS shall implement the identified protocols and measures without regard to this distinction and advise the Federal Project Officer (FPO) immediately if any issues arise related to the ability to comply fully with any requirement or recommendation listed below.

For each protocol or measure listed, LA-RICS shall include the following information in its periodic report to the FPO administering the grant:

- a. Specifically where and when the protocol has been used or a measure has been implemented during the reporting period, and
- b. Whether full compliance with the protocol or measure was achieved.

The FPO may, if they determine necessary, require additional information to ensure compliance with the protocol or measure. If, at any time, LA-RICS has questions or requires clarification regarding any of these protocols or measures, they shall notify the FPO, who will coordinate with the appropriate regulatory authority to provide the necessary information.

Biological Resource Protection Protocols and Measures

LA-RICS consulted with the U.S. Fish and Wildlife Service (USFWS) regarding potential impacts on biological resources. Informal consultation with the USFWS resulted in the agency's concurrence in letters dated February 28, 2019 stating that the Proposed Action may affect, but is not likely to adversely affect the southwestern willow flycatcher (*Empidonax traillii extimus*), least Bell's Vireo (*Vireo bellii pusillus*), and coastal California gnatcatcher (*Poliioptila californica californica*), and no effect on their designated critical habitat, assuming that the construction management requirements (CMRs) found in Appendix A-1 of the SEA3 are implemented.

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.¹ 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.

Historic and Cultural Resource Protection Protocols and Measures

On December 4, 2019, NTIA provided information about the Proposed Action, a description of the direct and indirect areas of potential affect, maps, photos, and descriptions of any historic properties identified and evaluation efforts, through the Federal Communication Commission's (FCC) Tower Construction Notification System (TCNS), to nine federally recognized tribes interested in the Proposed Action's geographical location in California. Consultation was completed on February 15, 2019 with no additional requests for information nor information regarding additional tribal resources was received; however, several tribes requested that if cultural resources are inadvertently identified during construction that the tribes are contacted for further consultation regarding the discovery.

In addition, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed on November 5, 2018 to determine if sacred lands or other resources of significance to the Native American community were known to exist in proximity to the Proposed Action. No additional tribal resources were identified as part of this record search; however, NAHC provided additional contact information for California non-federally recognized tribes/groups potentially interested in the Proposed Action areas. These tribes/groups were contacted and no information regarding additional tribal resources was received.

Project stipulations resulting from the consultation with the tribes include:

1. In the event that cultural artifacts are encountered during ground disturbing activities, LA-RICS shall halt all work until a qualified archaeologist can be consulted on the nature

¹ Minor changes have been made to the CMRs included in the SEA3 from the previous version in the SEA2 and Revised Finding of No Significant Impact issued September 2, 2015. A copy of the revised CMRs are attached.

and significance of such artifacts, and the tribes are notified and consulted on the discovery, consistent with cultural resource management (CRM) CMR 3 and 4.

As part of local government outreach, various municipalities were also contacted for the LTE sites on November 2, 2018. Some additional information regarding historic structures was provided and incorporated as part of the cultural resources review and analysis, as applicable with regard to the areas of impact.

In a submittal dated February 18, 2019, NTIA initiated consultation with the California State Historic Preservation Officer (SHPO) for the Proposed Action. This submittal included detailed information about the Proposed Action, a description of the direct and indirect areas of potential affect, maps, photos, descriptions of any historic properties identified and evaluation efforts, tribal and public consultation efforts and results, and determinations of effects for each LTE site.

No National Register of Historic Places (NRHP)-listed or -eligible archaeological or architectural resources were identified within the direct areas of potential effect at any of the LTE sites. NRHP-listed or -eligible archaeological and architectural resources were identified within the indirect areas of potential effect at seven of the LTE sites. Based on previous disturbance, existing visual disturbances, and/or overall minimal visual effects, it was determined that there would not be adverse effects to these resources. SHPO concurred with this determination by letters on March 26 and March 28, 2019.

Project stipulations resulting from the consultation with the SHPO include:

1. In the event that cultural artifacts are encountered during ground disturbing activities, LA-RICS shall halt all work until a qualified archaeologist can be consulted on the nature and significance of such artifacts, consistent with CRM CMR 3 and 4.

A series of CRM CMRs have been developed to minimize or avoid potential effects to cultural resources, including archaeological and architectural resources, 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 qualified archaeologists with appropriate expertise to monitor construction activities and implement the CRM CMRs. The archaeologists provided by the construction contractor will be approved by LA-RICS.

Additional Protection Protocols and Measures

1. LA-RICS will follow permitting and regulatory requirements outlined and required by the Federal Aviation Administration (FAA), Federal Communications Commission (FCC), and other applicable state and local agencies for all Proposed Action activities.
2. LA-RICS will adhere to all mitigation measures related to noise in the Final EA, SEA1, SEA2, and SEA3.

3. LA-RICS will adhere to all mitigation measures related to air quality (AIR MM 1) in the Final EA, SEA1, SEA2, and SEA3.
4. LA-RICS will adhere to all mitigation measures related to geology and soils (GEO MM 1-2) in the Final EA, SEA1, SEA2, and SEA3.
5. LA-RICS will adhere to all mitigation measures and CMRs (BIO CMR 1-19) related to biological resources in the Final EA, SEA1, SEA2, and SEA3.
6. LA-RICS will adhere to all mitigation measures and CMRs (CRM CMR 1-6) related to cultural resources in the Final EA, SEA1, SEA2, and SEA3.
7. LA-RICS will adhere to all mitigation measures related to aesthetic and visual resources (AES MM 1-3) in the Final EA, SEA1, SEA2, and SEA3.
8. LA-RICS will adhere to all mitigation measures related to infrastructure (TRANS MM 1) in the Final EA, SEA1, SEA2, and SEA3.
9. LA-RICS will adhere to all mitigation measures related to human health and safety (HS MM 1-3) in the Final EA, SEA1, SEA2, and SEA3.

Additional mitigation measures identified in the SEA3 as being required to avoid potential significant environmental impacts:

None.