



Categorical Exclusion Form

Project: Replacement of a Communications Tower in Everglades National Park

PEPC Project Number: 52326

Description of Action (Project Description):

Verizon Wireless Personal Communications, LP (Verizon Wireless) has submitted an application to the NPS for a right-of-way permit to install wireless telecommunication facilities (WTFs) at the Dr. Bill Robertson Center within Everglades National Park (ENP). The NPS is required by the Telecommunications Act of 1996 to consider all applications for installation of cellular equipment on NPS lands. The proposed issuance of a right-of-way permit by the NPS to Verizon Wireless would allow for:

- (1) The replacement of an existing 250-foot, guyed radio tower (currently supporting NPS radio repeaters) with a self-supporting wireless telecommunications tower of the same height
- (2) The installation of a pre-fabricated equipment shed, fenced compound, and access drive at the Dr. Bill Robertson Center within Everglades National Park (ENP), in Homestead, Miami-Dade County, Florida
- (3) Removal of existing tower including associated infrastructure and facilities, and site clearing and improvement of the previously disturbed site to grade

The existing radio tower supports NPS communications equipment. The replacement tower would support NPS and U.S. Geological Survey communications equipment, Verizon Wireless cellular telephone equipment, and the potential collocation of Miami-Dade County Fire Rescue, Florida Power & Light (FPL), and three other carriers' telecommunications equipment. The proposed facilities would provide wireless communication along a portion of the Main Park Road (State Road 9336) from the Ernest F. Coe Visitor Center to near the West Lake visitor use area which currently lacks or has poor, inconsistent coverage in limited areas.

In accordance with the National Environmental Policy Act, the NPS began the proposed project as an Environmental Assessment (EA). Following the scoping process, refinements to the proposal to avoid/minimize impacts through required design changes and mitigations measures, and changes to NPS Director's Order-12 in late 2015, the determination was made by park managers in consultation with the Southeast Region Environmental Coordinator that it was appropriate to complete this project as a documented Categorical Exclusion.

Documents related to this project and its implementation, including public and agency scoping input, construction drawings, photographic simulations, mitigation measures, Federal Aviation Administration (FAA) lighting requirements (Advisory Circular 70/7460-1K), and U.S. Fish and Wildlife Service Clearance to Proceed with Construction of Communication Towers letter, and the Floodplain Statement of Findings are available at: <http://parkplanning.nps.gov/projectHome.cfm?projectID=52326> and clicking on the "Document List".

Project Locations:

Location

County:	Miami-Dade	State:	FL
		Other:	Dr. Bill Robertson Center, Everglades National Park

Mitigations: The project leader is responsible for ensuring compliance with all project mitigations. This includes timely communication and coordination with subject matter experts as needed to ensure that compliance with identified mitigation measures.

General Project Mitigations: The NPS project manager is responsible for ensuring that the project remains within the construction limits and parameters established in the compliance documents and that mitigation measures are properly implemented.

- Construction zones outside of the existing disturbed area would be identified and fenced with construction tape or some similar material prior to any construction activity. The fencing would define the construction limits and confine activity to the minimum area required for construction as identified in the permit application, construction drawings, and related documents.
- All protection measures would be clearly stated in the construction specifications/special construction requirements, and workers would be instructed to avoid conducting activities beyond the construction limits as defined by the construction fencing or similar material. This could include necessary temporary structures such as erosion control fencing.
- All tools, equipment, barricades, signs, surplus materials, and rubbish would be removed from NPS property upon project completion. Any road and off-road surfaces damaged due to work on the project would be repaired to original condition as much as is feasible. All demolition debris would be removed from the project site, including all visible concrete and metal pieces.
- Contractors would be required to properly maintain construction equipment (i.e., mufflers) to minimize noise from use of the equipment.
- A hazardous spill plan would be in place, stating what actions would be taken in the case of a spill, notification measures, and preventive measures to be implemented, such as the placement of refueling facilities, storage, and handling of hazardous materials, etc.
- A soil and groundwater management plan would be in place for the proper collection, transfer and disposal of construction derived waste materials.
- All equipment on the project would be maintained in a clean and well-functioning state to avoid or minimize contamination from automotive fluids. All equipment would be checked daily. All heavy equipment will be thoroughly washed at the home construction yard prior to entering Everglades National Park to ensure that soil, seeds, and other plant propagules from outside sites are not transported into the Park.
- Best management practices (BMPs) for drainage and sediment control, as identified in the contractor's Storm Water Pollution Prevention Plan, would be implemented to prevent or reduce nonpoint source pollution and minimize soil loss and sedimentation in drainage areas.

- Use of Best Management Practices in the project area for drainage area protection would include the following actions:
 - keeping disturbed areas as small as practical to minimize exposed soil and the potential for erosion,
 - locating waste and excess excavated materials outside of drainages to avoid sedimentation,
 - installing silt fences, temporary earthen berms, temporary water bars, sediment traps, stone check dams, or other equivalent measures (including installing erosion-control measures around the perimeter of stockpiled fill material) prior to construction,
 - conducting regular site inspections during the construction period to ensure that erosion-control measures were properly installed and are functioning effectively,
 - storing, using, and disposing of chemicals, fuels, and other toxic materials in a proper manner, and
 - prior to application of any pesticide, review and approval will be obtained from NPS.

Human Health and Safety: The NPS is concerned with the safety of visitors to the park and will cooperate with proposals to enhance visitor safety as long as those proposals do not result in a derogation of NPS resources, or conflict with the current or planned use of NPS property. NPS Management Policies state that, "while recognizing that there are limitations on its capability to totally eliminate all hazards, the NPS and its concessionaires, contractors, and cooperators will seek to provide a safe and healthful environment for visitors and employees" (sec. 8.2.5.1). Further, "the NPS will strive to protect human life and provide for injury-free visits (sec. 8.2.5)."

Reference Manual, Special Park Uses, Appendix 5, Exhibit 6, (RM-53), April 2000 sets forth the procedures applicable to permitting wireless telecommunication facility sites in units of the National Park System. The manual directs NPS to consider the safety of the visiting public as a factor when reviewing wireless telecommunication facility applications. Also included in the mitigations below are the technical review conditions from the NPS Field Operation Technical Support Center (FLOTSC) and the conditions to be met before granting a ROW permit.

- Construction information and general information about the project would be posted at the park, distributed to visitors, and made available on the park's web site. Signage and notices would be used to inform visitors about the purpose of the project and to protect visitor and staff safety during construction activities.
- Construction procedures would include the use of turbidity curtains to contain disturbed sediments and reduce water quality impacts.
- A spill prevention, control, and countermeasures plan would be completed and implemented for any fuel storage tanks, which would meet all applicable standards for construction and leak detection. Areas used for refueling would be limited to areas where these activities currently occur.
- Visitors and NPS staff (other than project participants) would not be allowed to access the construction site. Emergency vehicles would be allowed on site if needed.
- During construction, the contractor would be required to implement dust control mitigation procedures to reduce the particulate matter. Additional mitigation measures that would be implemented include allowing construction vehicles to idle up to, but not exceeding five minutes, when parked.
- Verizon must conduct and submit an inter-modulation (IM) study taking into account all transmitting stations/radio frequencies to be placed on the tower.
- Grounding rings and site grounding are modified to meet Motorola R56 communication site standards, including but not limited to fencing, gates, generator and propane tank.

- Verizon/tower owner provide the following on site in accordance with FCC OET-65 bulletin: tower owner, FCC Antenna Site Registration number, contact information and RF safety signs posted.

Park Management and Operations:

- Park employees would have prior notice of any activities occurring so the impedances of management and operations would be minimized.
- Spill prevention, control, and countermeasure procedures, as well as storm water pollution prevention measures, would be implemented to reduce the potential for petroleum products from leaking equipment or vehicles to reach surface waters.
- Steps would be taken to minimize the introduction of non-native species which would include washing equipment before entering the park, minimizing disturbances, and initiating revegetation of disturbed areas immediately after construction. The NPS would follow all guidelines outlined in the South Florida and Caribbean Parks Exotic Plant Management Plan and Everglades National Park Hurricane Plan.
- Revegetation efforts following construction of the Proposed Action alternative would include using seeds from native species during revegetation, monitoring reclamation, and implementing exotic species control as necessary.

Wildlife and Protected Species: The site location does not have any nesting, roosting, or critical habitat areas for endangered or threatened species, nor any currently listed species of special concern. Mitigation measures below would serve to reduce impacts on special status and other wildlife species.

- Pre- and post-construction surveys would be conducted to identify any federal and state-listed species in the area (e.g., eastern indigo snakes). Should individuals or nest sites be identified, additional measures would be taken to avoid impacts in coordination with NPS (e.g., fencing nest sites, providing information to contractors about the species, delaying project activities), and additional consultation with Federal and State agencies may be required.
- Construction would occur only during daylight hours.
- The clearing limits (construction limits) would be clearly marked or flagged prior to construction to limit disturbance to wildlife habitat.
- Feeding or approaching wildlife would be prohibited.
- Any wildlife collisions would be reported to park personnel.
- Perch discouragers or other appropriate devices or design options will be included to prevent vultures and other birds from being attracted to and using the tower as a roost site.
- A litter control program would be implemented during construction to eliminate the accumulation of trash. Spilled food would be cleaned up.
- Park biologists or rangers would be notified if bears loiter in the area, or if sightings occur.

Wilderness Character: The visual intrusion is a potential problem with tall structures whether they are communications towers or buildings. Lighting is required by the Federal Aviation Administration (FAA) for flight safety. Below are lighting related mitigations (also found under the Night Sky topic) that will reduce adverse impacts to wilderness character.

- Communications towers are required to meet FAA lighting specification requirements. The proposed lighting meeting FAA requirements is a dual medium intensity system. This dual lighting system includes red lights (L-864) for nighttime and medium intensity flashing white lights (L-865) for daytime and twilight uses. During the daytime hours, only the top beacon would be illuminated emitting a flashing white light. At night, the system would automatically revert to medium intensity red lighting. The top beacon would flash slowly while a second beacon, mounted mid tower would be a steady red light. The second mid tower mounted red light would only operate at night. The proposed dual medium intensity light system is controlled by a device that changes the system when the ambient light changes. This will be an improvement as compared to the lighting system on the current tower.
- Artificial lighting, including minimum illumination levels, light-emitting diodes (LED), limited color spectrum (e.g., yellow) lights, and timers and sensors would be used, where applicable, to ensure safety.
- The use of artificial lighting would be restricted to areas where security, basic human safety, and specific cultural resource requirements must be met.
- Per NPS "Management Policies 2006," artificial lighting would not be used in locations where its presence would disrupt wildlife dependent upon the dark. Minimal-impact lighting techniques would be used. The use of lighting is not anticipated in view of the fact that all construction activities are expected to take place during daylight hours. However, construction crews may carry emergency/safety lighting and would be instructed to abide by the NPS "Management Policies 2006".

Soundscapes, Night Sky and Scenery: Construction activities for the tower replacement project would involve multiple pieces of heavy equipment for drilling, placement of tower caissons, and construction materials staging. Best management practices for noise, such as using mufflers on heavy equipment and noise muffling construction materials, would be implemented and result in short-term minor impacts to soundscapes. Assuming that heavy equipment operates at 80 to 90 decibels (dB), and that sound levels decrease approximately 6 dB with the doubling of distance (Harmon 2006), it would be estimated that natural attenuation would decrease the noise from these activities to no greater than 32 to 42 dB at a distance of about 1,500 feet from the work area; noise would continue to dissipate with increased distances from the area.

Mitigations for this topic are the same as for Wilderness Character (above).

Visitor Use and Experience:

- Visitors would be notified when construction would occur and information would be posted on the park website, and at visitor centers (project construction would not occur between peak winter-spring season of December through April).
- Construction information and general information about the project would be posted at the park, distributed to visitors, and made available on the park's web site. Signage and notices would be used to inform visitors about the purpose of the project and to protect visitor and staff safety during construction activities.
- Other mitigations that avoid/minimize impacts to visitor use and experience related to tower and site lighting are included in the mitigations for Wilderness Character (above).

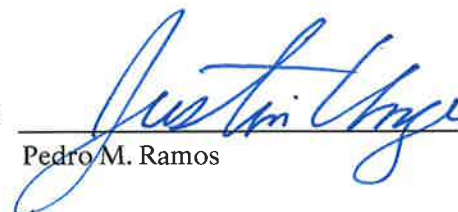
Cultural Resources: According to the 2008 National Park Service Programmatic Agreement Section VI, if previously unidentified cultural resources are discovered during project implementation all work in that area must stop and the Superintendent, Park Archaeologist or Chief of Cultural Resources must be notified immediately. If items protected by the Native American Graves Protection and Repatriation Act (NAGPRA) are discovered during project implementation all activity must cease in the area of discovery and immediate notice made to the Superintendent, as well as the appropriate federally recognized Indian Tribes / Organizations and State Historic Preservation Officer (SHPO).

Wetlands and Vegetation:

- Impacts to wetland resources would be avoided and minimized to the maximum extent feasible through the implementation of construction BMPs. All unavoidable impacts would be mitigated.
- Construction procedures would include the use of turbidity curtains to contain disturbed sediments and reduce water quality impacts.
- A turbidity monitoring plan would be implemented to ensure compliance with State water quality criteria.
- A temporary "no splash zone" would be established in and around the project area during construction to eliminate further dispersal of suspended sediments.
- Equipment containing fuels would be checked frequently for leaks and immediately repaired and/or removed from the park property.
- Topography of the existing tower site including land under the guy wires would be graded to the elevation of adjacent, recently restored wetlands, and the fill material would be transported to the nearest HID soil mound for disposal.

CE Citation: C.18 – Construction of minor structures, including small improved parking lots, in previously disturbed or developed areas.

Decision: I find that the action fits within the categorical exclusion above. Therefore, I am categorically excluding the described project from further NEPA analysis. No extraordinary circumstances apply.

Signature
Superintendent:  Date: 1/19/16
Pedro M. Ramos