



FEMA

OFFICE OF ENVIRONMENTAL PLANNING AND HISTORIC PRESERVATION
PARTNERS IN SHAPING RESILIENT COMMUNITIES



Environmental and Historic Preservation (EHP) Fact Sheet: Communication Towers

Environmental resources, cultural institutions, and historic assets define communities and contribute to their well-being and unique character. The Federal Emergency Management Agency (FEMA) plays a critical role by helping communities incorporate environmental stewardship and historic preservation into emergency management decisions. As disasters continue to challenge our nation and communities grapple with issues of preparedness and sustainability, FEMA offers expertise to ensure both legal compliance and informed local, State, Tribal, and national planning.

Communication Towers and EHP Review

FEMA's Grants Preparedness Directorate provides funding to eligible applicants for projects that involve the construction, replacement, or repair of communication towers as well as the installation or repair of associated equipment such as antennas or repeaters. These projects can be complex (such as the construction of new towers), or relatively simple (such as the installation or repair of associated equipment). In both cases, applicants must communicate with FEMA early in the planning process to help identify the agency's specific regulatory requirements and the process that must be followed to complete EHP review.

Considering EHP Impacts

Construction of new towers can have significant impacts on the environment, including but not limited to floodplains, migratory birds, and historic properties and may require an environmental assessment (EA) under the National Environmental Policy Act (NEPA). In most cases, it is the applicant's responsibility to complete these compliance documents. In some cases, the cost of EAs can be included as a part of the applicant's grant funding; the applicant should discuss their project's EHP compliance needs with FEMA as the project is designed to identify how these costs may be funded.

Towers may have significant visual impacts on historic properties and adversely impact archeological sites. Section 106 of the National Historic Preservation Act requires Federal agencies to take into account the effect of their undertakings on historic properties through consultation with the relevant State Historic Preservation Office (SHPO), Tribal Historic Preservation Office for Federally-recognized tribes, and Native Hawaiian organizations.

Completing the Grant Application

It is important that applicants provide complete and accurate information to facilitate EHP review and avoid unnecessary delays. Many of the towers funded by FEMA are regulated by the Federal Communications Commission (FCC), and the FCC as a Federal agency is required to comply with environmental regulations. FEMA has the benefit of an agreement with the Advisory Council on Historic Preservation allowing FEMA to use FCC's Section 106 review to suffice for FEMA's own historic preservation compliance responsibilities. Applicants should include all relevant FCC documentation in the grant application.

EHP Considerations for Communication Towers

- Develop realistic alternatives that can be evaluated in the environmental review process.
- Provide any environmental or historic studies that may have been completed on the site to help guide the level of review and to reduce the number of future studies to be completed on the site.
- Coordinate with appropriate agencies to attain all necessary permits prior to initiation of the project.
- Avoid locating towers in a flood hazard area.
- Ensure that archaeological resources are identified and impacts resolved prior to initiating construction.



Communication Tower Projects: Grant Application EHP Checklist

The checklist below describes project information that FEMA requires in order to complete EHP review of a communication tower project.

<input checked="" type="checkbox"/>	Location	State the location of the project, including both the site address and latitude/longitude in decimal degrees (e.g., 38.5342°N,-77.0212°W). Include a site map clearly showing the location of all proposed project components (including access roads and parking, landscaping and grading, and utilities).
<input checked="" type="checkbox"/>	Description of Project Scope of Work	Provide a scope of work and any alternatives considered for the project, including preliminary designs (if available), staging areas, construction access, plans for grading and extent of ground disturbance, as well as extent of vegetation removal.
<input checked="" type="checkbox"/>	Photographs	Submit clear, color photographs of the project site and surrounding structures. Photographs should be labeled with the location and orientation of the tower relative to the project site.
<input checked="" type="checkbox"/>	Environmental Assessment	Determine whether or not an EA may be needed and confirm with your FEMA EHP contact.
<input checked="" type="checkbox"/>	FCC Section 106 review process	Complete the FCC's Section 106 review process and submit all documentation resulting from the review (see best practices below).

Timeframes for EHP Review

Timeframes for EHP review vary depending on a project's potential to impact the environment and historic properties, and the complexity of the proposed project. An EA will extend the review period as it involves outside resource agencies and other stakeholders, including the public, and more in-depth resource evaluation. In general, completion of an EA will take between 60 and 180 days. Section 106 consultation can take 30 to 90 days if there are no adverse effects associated with the project. Projects that are found to be adverse, such as those that affect an archaeological site or the viewshed of a National Register Historic District, can take 6 – 12 months to negotiate measures to resolve the adverse effect(s). Applicants and grantees should work with their EHP contact to identify ways to expedite the review process.

EHP Best Practices: Orange, Massachusetts

For the most effective and timely review of tower projects, applicants may decide to utilize professionals with experience in NEPA, and other aspects of environmental and historic preservation compliance. A knowledgeable and experienced professional can guide an applicant through the various regulatory compliance actions that may be needed for FEMA to complete its EHP review process. In Orange, Massachusetts, the planning commission received funding through the State Homeland Security Program to install a 140 ft. self-supported lattice tower adjacent to an existing water tank (constructed in 1980) located on North Main Street. The project also included fencing, support equipment, and a generator. The applicant hired a contractor who helped them complete the EHP submittal packet and led them through the FCC's Section 106 review process, which included a public notice, archaeological assessment, and consultation with the SHPO and regional Tribal organizations. With complete information about the project and coordination with the FCC and other regulatory agencies at the time of project submittal to FEMA, FEMA was able to complete its review of the project in just seven weeks. Additionally, FEMA was able to complete the EHP review process without the necessity of an EA because the applicant's submittal of complete project data, evidence of coordination with the required regulatory agencies, and the public documentation that the project was unlikely to cause environmental impacts or affect historic properties.

Additional Resources: For more information on EHP review and FEMA grant assistance, contact your State Emergency Management Agency or tribal office or visit <http://www.fema.gov/environmental-planning-and-historic-preservation-program>.