



Draft Environmental Assessment

Gladwin County, MI Wireless Communications Tower

Beaverton, Gladwin County, MI

Homeland Security Grant Program

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**U.S. Department of Homeland Security
Washington, DC 20472**



FEMA

ENVIRONMENTAL ASSESMENT
for
GLADWIN COUNTY COMMUNICATIONS TOWER

COUNTY OF GLADWIN, MICHIGAN

GLADWIN COUNTY EMERGENCY MANAGEMENT
501 W. Cedar Avenue
Gladwin, MI 48624

and

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SECTION ONE: BACKGROUND

INTRODUCTION

One of the core missions of the Department of Homeland Security (DHS) is to enhance the ability of state, local, and tribal governments to prevent, protect against, respond to, and recover from terrorist attacks and other disasters. FEMA's comprehensive suite of grant programs are an important part of the administration's larger, coordinated effort to strengthen homeland security preparedness. These programs implement objectives addressed in a series of post-9/11 laws, strategy documents, plans and Homeland Security Presidential Directives (HSPDs) including the Homeland Security Grant Program. These grants may fund a wide range of preparedness activities, to include planning, organization, equipment purchase, training, exercises, and management and administration costs. Funding for this project was awarded to the Michigan State Police Emergency Management Homeland Security Division (EMHSD) under the Department of Homeland Security (DHS)-Federal Emergency Management Agency's (FEMA) Homeland Security Grant Program (HSGP). The project was sponsored by Gladwin County Emergency Management (EM) who received funding in the amount of \$96,519.00 from the FY 2008 Homeland Security Grant Program (SHSP).

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 Management Directive 5100.1, FEMA must fully understand and consider the environmental consequences of actions proposed for federal funding.

PURPOSE AND NEED

It is Gladwin County EM's objective to have improved radio coverage throughout Gladwin County. In a large portion of Gladwin County there are issues related to the loss of radio coverage at this time. 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 document and by the HSGP grant award is that of providing sufficient system capability to achieve radio coverage throughout Gladwin County.

SECTION TWO: ALTERNATIVES ANALYSIS

The following alternatives were considered to address the need for radio coverage in all of Gladwin County: the No Action alternative, Renting space on existing broadcast tower and (Proposed Action) Construction of new 170ft Communications tower and antenna system for improved coverage of Gladwin County.

ALTERNATIVES CONSIDERED AND DISMISSED

Purchasing an existing tower was not an option as there were no towers available within the county to purchase. Another alternative was considered to rent space on an existing antenna or tower. The alternative site was reviewed. The tower is an old AM Broadcast tower built in the early 1960s. The tower structure required an extensive structural upgrade, painting and potential re-guying. The integrity was in question and deemed to be unsuitable. Due to the structural upgrades necessary, this alternative was determined to be not cost-effective for the county. Therefore, this alternative was dropped from further consideration.

ALTERNATIVE 1 - NO ACTION ALTERNATIVE

Under the No Action alternative, the Gladwin County radio communications system would not receive a radio coverage upgrade. No communication tower would be constructed.

ALTERNATIVE 2 - CONSTRUCTION OF TELECOMMUNICATION FACILITY IN TOBACCO TOWNSHIP PROPOSED SITE (PROPOSED ACTION)

The proposed project site is located .03 miles north and .4 miles west of the intersection of M30 and Van Dyke Road in Tobacco Township, Gladwin County, Michigan (see appendix A). The site coordinates are Latitude = 43-52-19.25N Longitude = 084-22-28.56W, in Gladwin County, Michigan. The property is owned by Beaverton School District and has never been developed. The proposed scope of work includes the construction of telecommunication infrastructure at the Tobacco Township site, including a 170-foot tower with antennas, cabling, concrete pad, and associated electronic equipment, to provide improved radio coverage to its existing public safety radio communications system. Proposed tower will be connected to existing electric utility through a 220 foot cable trenched and attached to an existing power pole on Van Dyke Road. Proposed ground disturbance is 250 feet by 150 feet with an approximate depth of 30 feet. An existing maintenance trail to the west of the site will be upgraded and expanded to

support construction equipment and for future maintenance of the tower. Gladwin County Emergency Management determined that the proposed Gladwin County South Tower project would successfully address radio coverage issues within the proposed coverage area.

The proposed tower will utilize an equilateral triangular pattern with either steel pipe or solid steel legs, and tubular or angle steel cross bracing with bolted construction. The cross bracing is angular solid tubing and is bolted to the legs. The sections are hot-dipped galvanized after fabrication. This tower shall be engineered to specifically meet and adequately handle the equipment to be installed.

SECTION THREE: AFFECTED ENVIRONMENT AND IMPACTS

PHYSICAL ENVIRONMENT

While historic properties, floodplains, wetlands, prime farmlands, airport runway clear zones and other environmentally sensitive areas exist within the County of Gladwin, none of the aforementioned areas are found within the boundaries of the proposed project site.

The table below 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.

Environmental Area (Check only One box)	No Consultation Required	Consultation Required and Completed	Permit Consistent with Applicable Plans/Standards	Project Consistent with Applicable Plans/Standards	Mitigation Required Conditions/Safeguards	All determinations need explanation. Reference to documentation sources, notes and correspondence. Attach additional sheets if necessary.
1. HISTORIC PROPERTIES		X			X	This project will have no affect on historic properties and/or archaeological sites
2. FLOOD HAZARD PROTECTION	X					This project is not affected by nor will it affect a flood hazard area--see attached Flood Plain Map of affected area
3. WETLAND PROTECTION	X				X	The project will not significantly impact area wetlands-- see attached wetlands inventory map from the US Fish and Wildlife Service

4. DRINKING WATER AND GROUNDWATER PROTECTION		X				This project will not affect the local drinking water or groundwater in general-- see letters from MI Department of Natural Resources Environmental
5. ENDANGERED SPECIES	X					The project will not significantly impact endangered species-- see attached letter from Nicholas Mueller, Environmental Protection Specialist
6. AIR QUALITY PROTECTION		X				This project will not affect the local air quality standards-- see letters MI Department of Natural Resources Environmental
7. SOLID WASTE		X				The project will not be affected by sanitary landfill areas, abandoned dumps, or other solid waste disposal sites. Project debris will be disposed of in an approved solid waste facility.-- see letters from MI Department of Natural Resources Environmental
8. WATER QUALITY		X				This project will not impact state water quality standards-- see letters from MI Department of Natural Resources Environmental
9. NOISE	X					The project will not affect nor be affected by the ambient noise level in the local area except temporarily during project construction.
10. MAN-MADE HAZARDS 24CFR PART 51 C&D	X				X	The project will not be affected by nor affect man-made hazards in the area. The tower is located in a remote rural setting with no man-made hazards on or near the site
11. FARMLAND PROTECTION	X					This project will not affect prime farmland--see attached farmland classification map USDA/Natural Resources Conservation Service that indicates/Not Prime Farmland
12. AIRPORT RUNWAY CLEARANCE ZONES		X				This project will not affect nor be affected by airport runway clearance zones. See attached FAA report of No Hazard to Air Navigation

PHYSICAL RESOURCES

Farmland Protection

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 located within the rural boundaries of Gladwin County and is a wooded area never utilized as farmland.

The farmland classification map from the Web Soil Survey of the Natural Resource Conservation Service indicates that the proposed project area includes two types of soils: Rubicon sand (0-6 percent slope) and Rubicon sand (12-25 percent slope)(See Appendix A). Neither soil type is classified as prime or unique soils. Therefore, the proposed project site will not affect prime or unique farmland.

Impact Threshold – The proposed project may have an adverse impact on prime or important farmlands if it requires said farmlands to be removed from production to allow for the project to progress. The attached USDA Natural Resources Conservation Service map indicates that the proposed action would have no impact on prime or significant farmland.

No Action Alternative - Under the No Action alternative, no impacts to prime or important farmland would occur.

Proposed Action Alternative - Under the Proposed Action, no significant impacts to prime or important farmland would occur.

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 (NO₂), Ozone (O₃), Lead (Pb), Particulate Matter (PM₁₀), and Sulfur Dioxide (SO₂).

An environmental review response letter received from Michigan Department of Natural Resources Environmental, MI (DNRE) stated that the project will have little or no impact on air quality (Appendix B).

Impact Threshold - Mitigation measures will have to be identified and implemented if the proposed project will have an adverse impact on air quality within the project area. The MI (DNRE) has determined that this project will not result in a significant impact on air quality.

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 Alternative, short-term impacts to air quality would occur during construction activities. To reduce impacts, the construction contractors would be required to wet down construction areas as needed to mitigate fugitive dust. Emissions from fuel-burning engines (e.g., heavy equipment and earthmoving machinery) could also temporarily increase the levels of some of the criteria pollutants, such as CO, NO₂, O₃, PM₁₀, and non-criteria pollutants such as VOCs. To mitigate these emissions, fuel-burning equipment run times would be kept to a minimum and equipment would be properly maintained.

WATER RESOURCES

There are no rivers, lakes, streams or other water bodies on or near the site. The nearest water resources are the Tittabawassee River 2.14 miles to the east and the Cedar River 1.94 miles to the southwest of the proposed site.

Water Quality

Environmental review response letters received from Michigan Department of Natural Resources Environmental, MI (DNRE) stated that the project will have little or no impact on surface water quality (Appendix B).

Impact Threshold - Mitigation measures will have to be identified and implemented if the proposed project will have an adverse impact on water quality within the project area. The MI (DNRE) has determined that this project will not result in a significant impact on water quality (Appendix B).

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

Proposed Action Alternative - Under the Proposed Action Alternative, there would be no direct permanent impacts to surface waters. Construction activities would increase the amount of impervious land on the site and would therefore increase runoff. Temporary short term impacts to downstream surface waters could possibly occur during the construction period however, these impacts would be minimized by the installation and construction of appropriate BMP's to reduce potential runoff.

Drinking Water and Groundwater Protection

Environmental review response letters received from Michigan Department of Natural Resources Environmental, MI (DNRE) stated that the project will have little or no impact on drinking water quality or ground water quality (Appendix B).

Impact Threshold - Mitigation measures will have to be identified and implemented if the proposed project will have an adverse impact on drinking water and groundwater protection within the project area. The Michigan DNRE has determined that this project will not result in a significant impact on drinking water and groundwater protection.

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

Proposed Action Alternative - Under the Proposed Action, there would be no significant impacts to drinking water or ground water due to the type of activity and the small size of the project area (less than 1 acre). A National Pollution Discharge Elimination System (NPDES) permit is not necessary for this project.

Wetland Protection

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.

The U.S. Fish and Wildlife Service / National Wetlands Inventory Map of the proposed project area indicates that this area is not in Protected Wetlands. Identified wetlands are located with .10 miles to the north and east of the proposed project area. However, impacts to the wetlands will be minimized due to the installation and construction of appropriate BMP's to reduce potential runoff during project construction.

Impact Threshold - Mitigation measures will have to be identified and implemented if the proposed project will have an adverse impact on wetlands located within the project area.

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

Proposed Action Alternative - Under the Proposed Action, no direct impacts to wetlands are anticipated. Impacts to the wetlands in close proximity to the proposed project location will be minimized due to the installation and construction of appropriate BMP's to reduce potential runoff during construction. Construction material and top soil removed from the proposed project location cannot be stored within wetland areas. All disposal material must be disposed of in a licensed landfill.

Floodplains

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.

No Federal Insurance Rate Map for the proposed project location is available. Local research for identified floodplains in the area indicates that the elevation of the proposed project site is approximately 50 feet higher than the nearest identified floodplain approximately 1.5 miles to the east (Appendix A). No adverse impacts to the floodplain are anticipated.

Impact Threshold - Mitigation measures will have to be identified and implemented if the proposed project will be located within the boundaries of a floodplain protection area. A review of the Gladwin County Flood Insurance Rate Map determined that this project will not be located within a flood hazard protection area and will not have an adverse impact on flood hazard protection.

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

Proposed Action Alternative - Under the Proposed Action, no impacts to floodplains are anticipated, because the proposed project site is not located in or near an identified floodplain.

COSTAL RESOURCES

According to the U.S. Maritime Protected Areas Map found at the NOAA website (<http://mpa.gov/dataanalysis/mpainventory/mpaviewer/mpaviewer.swf>) there are no protected costal resources in the County of Gladwin, Michigan.

BIOLOGICAL RESOURCES

The vegetation in the area consists of scrub trees, brush and vegetation undergrowth. The entire area has been logged off undeveloped for a century or more and no unbroken prairie sod or old-growth timber exists within the project area.

Threatened and Endangered Species and Critical Habitat and Wildlife and Fish

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).

The Federal Emergency Management Agency has completed an endangered species review for the construction of a 170 foot self-supporting communication tower with three antennae and associated equipment shed and concrete pad located at N 43° 52' 19.4" and W 84° 22' 28.6" in Gladwin County, Michigan. In compliance with Section 7 of the Endangered Species Act, a review of the potential impacts to federally listed endangered, threatened and candidate species has been completed. According to the U.S. Fish and Wildlife technical assistance website, the following federally listed species are known to occur in Gladwin County: none.

Based on the fact that there are no listed species in the county, the proposed action will have “no effect” on the listed species, their habitats or proposed or designated critical habitat.

Impact Threshold - Mitigation measures will have to be identified and implemented if the proposed project will have an adverse impact on endangered species within the project area. The US Fish and Wildlife Service have determined that this project will not result in a significant impact on endangered species.

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.

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 US Fish and Wildlife Service are authorized to protect, and the Service has put forth recommendations for communication tower design and height to mitigate collision-related mortality.

Construction of the proposed communications tower has been determined to be the best option because co-locating the communications equipment on an existing tower or other structure is not an available option. The tower will be below 199 feet above ground level and will not require guy wires. The tower will be marked and/or lighted in accordance with FAA Advisory circular 70/7460-1 K Change 2, Obstruction Marking and Lighting, red lights – Chapters 4, 5 (Red), & 12 and will not be a part of a multiple-tower array or antenna farm.

According to responses from consulting agencies, this project will not be sited in wetlands, other known bird concentration areas, known migratory or daily movement flyways, or in habitat of

threatened or endangered species. The site is not in an area with a high incidence of fog, mist, and low ceilings.

Service personnel or researchers from the Communication Tower Working Group will be allowed access to the site to evaluate bird use, conduct dead-bird searches, to place net catchments below the tower but above the ground, and to place radar, Global Positioning System, infrared, thermal imagery, and acoustical monitoring equipment as necessary to assess and verify bird movements to gain information on the impacts of various tower sized, configurations, and lighting systems.

Impact Threshold – Mitigation measures outlined in the Service Interim Guidelines For Recommendations On Communications Tower Siting, Construction, Operation and Decommissioning issued by the US Fish and Wildlife Service will be implemented as practical for this project.

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. All project conditions from the United States Fish and Wildlife Service’s Service Interim Guidelines For Recommendations On Communications Tower Siting, Construction, Operation, and Decommissioning will be followed as possible to further reduce impacts to migratory birds.

CULTURAL RESOURCES

The existing rural environment surrounding the project site consists of scrub trees and brush vegetation in nature.

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.”

Historic Properties

FEMA has determined that no further review is necessary under the National Historic Preservation Act, pursuant to the Advisory Council on Historic Preservation's (ACHP) Program Comment effective October 23, 2009 (FR Doc. E9-27798). The proposed project was reviewed through the FCC Form 620 Section 106 procedures completed on 9/22/2010 (Appendix B). As this project has already been reviewed under Section 106 and as pursuant to section IV of the ACHP's Program Comment, FEMA will not review this project for Section 106 compliance and intends to move forward in approving this state homeland security project (Appendix B).

Impact Threshold - Mitigation measures will have to be identified and implemented if the proposed project will have an adverse impact on historic properties within the project area.

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. During construction, ground disturbing activities would be monitored. Should human skeletal remains or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site would cease and the coroner's office (in the case of human remains), FEMA, and the State Historic Preservation Office would be notified.

American Indian/Native Hawaiian/Native Alaskan Cultural/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 letter was sent to the various Tribal Historic Preservation Officers throughout the nation. The responses received stated there were no concerns about the proposed project (Appendix B).

Impact Threshold - Mitigation measures will have to be identified and implemented if the proposed project will have an adverse impact on areas that are culturally significant to Native Americans within the project area.

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. During construction, ground disturbing activities would be monitored. Should human skeletal remains or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site would cease and the

coroner's office (in the case of human remains), FEMA, and the State Historic Preservation Office would be notified.

SOCIOECONOMIC RESOURCES

The site location chosen for this proposed communication tower is located in a rural wooded site with few residences located within the visual area of the tower site location.

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.

Impact Threshold – The proposed project may have an adverse impact on environmental justice if a disproportionately high number of minority and low-income populations are negatively impacted by the proposed action. Demographic information from the 2000 US Census revealed that no minority or low-income populations would experience negative environmental consequences as a result of the proposed action.

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.

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.

Impact Threshold – If the proposed project generates a significant level of noise then it will have an adverse impact on noise levels within the project area. The Gladwin County EM and Region 3 HSPB Project Manager determined that the proposed action will have no impact on noise.

No Action Alternative - Under the No Action alternative, no significant 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. There do not appear to be any noise sensitive land uses within the area of potential effect.

Man-Made Hazards

Solid Waste

An environmental review response letter received from Michigan Department of Natural Resources Environmental, MI (DNRE) stated that the project will have little or no impact on waste management (hazardous waste/solid waste/asbestos) (Appendix B).

Impact Threshold – Mitigation measures will have to be identified and implemented if the proposed project will have an adverse impact on solid waste facilities within the project area. The Michigan DNRE has determined that this project will not result in a significant impact on solid waste.

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

Proposed Action Alternative

- Under the Proposed Action, no significant impacts to waste management are anticipated. Any hazardous materials discovered, generated or used during construction would be handled and disposed of in accordance with applicable local, state and federal regulations.

Airport Runway Clear Zones

A review of the airport runway clear zones in Gladwin County and the FAA report of No Hazard to Air Navigation show that this project will not be located within the boundaries of any airport runway clear zones (Appendix B).

Impact Threshold – The proposed project may have an adverse impact on airport runway clear zones if it is located within the boundaries of an airport runway clear zone. A review of the existing Gladwin County Regional Airport runway clear zone map revealed that the proposed action would not take place within an airport runway clear zone.

No Action Alternative - Under the No Action alternative, no impacts to airport runway clear zones would occur.

Proposed Action Alternative - Under the Proposed Action, there would be no significant impacts to airport runway clear zones.

Zoning and Land Use

The project is located in the zoning jurisdiction of the Township of Tobacco, carries a zoning designation of R-1, Residential (radio and television studios, communication transmitting and receiving towers are permitted uses under the R-1 designation) and has received approval for construction from Tobacco Township's zoning department (Appendix B). The project site is currently owned by the Beaverton School District.

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

Public notices pertaining to the finding of no significant impact to the environment and a request for release of funds will be published in the local newspaper prior the start of this proposed project and public comments and concerns will be received and addressed prior to funds being released.

SECTION SIX: MITIGATION MEASURES AND PERMITS

1. The applicant is responsible for obtaining and complying with all required local, State and Federal permits and approvals.
2. The applicant will monitor ground disturbance during the construction phase; should human skeletal remains, or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site shall cease and the applicant shall notify the

coroner's office (in the case of human remains), FEMA, and the State Historic Preservation Office.

3. If deviations from the proposed scope of work result in substantial design changes, the need for additional ground disturbance, additional removal of vegetation, or in any other unanticipated changes to the physical environment, the Grantee must contact FEMA, and a re-evaluation under NEPA and other applicable environmental laws will be conducted by FEMA.
4. Construction vehicles and equipment would be stored on site during project construction and appropriate signage would be posted on affected roadways. All construction activities will be performed using qualified personnel and in accordance with the standards specified in Occupational Safety and Health Administration regulations. Construction would take place only during normal business hours and all equipment will meet local, State and Federal noise regulations.
5. All project conditions from the United States Fish and Wildlife Service's Service Interim Guidelines For Recommendations On Communications Tower Siting, Construction, Operation, and Decommissioning will be followed as possible to further reduce impacts to migratory birds.
6. Any hazardous materials discovered, generated or used during construction would be handled and disposed of in accordance with applicable local, state and federal regulations.
7. Temporary short term impacts to downstream surface waters and wetlands could potentially occur during the construction period. However, these impacts would be minimized by the installation and construction of appropriate BMP's to reduce potential runoff.
8. As previously mentioned, under the Proposed Action, the tower will be built in accordance with all FAA, FCC and local regulations and conditions.

SECTION SEVEN: CONSULTATIONS AND REFERENCES

The following agencies and organizations were contacted and asked to comment on the proposed project.

- Township of Tobacco
- County of Gladwin Historical Society
- Michigan State Historic Preservation Office
- Federal Aviation Administration
- Federal Communications Commission
- Natural Resource Conservation Service
- Michigan Department of Environment and Natural Resources