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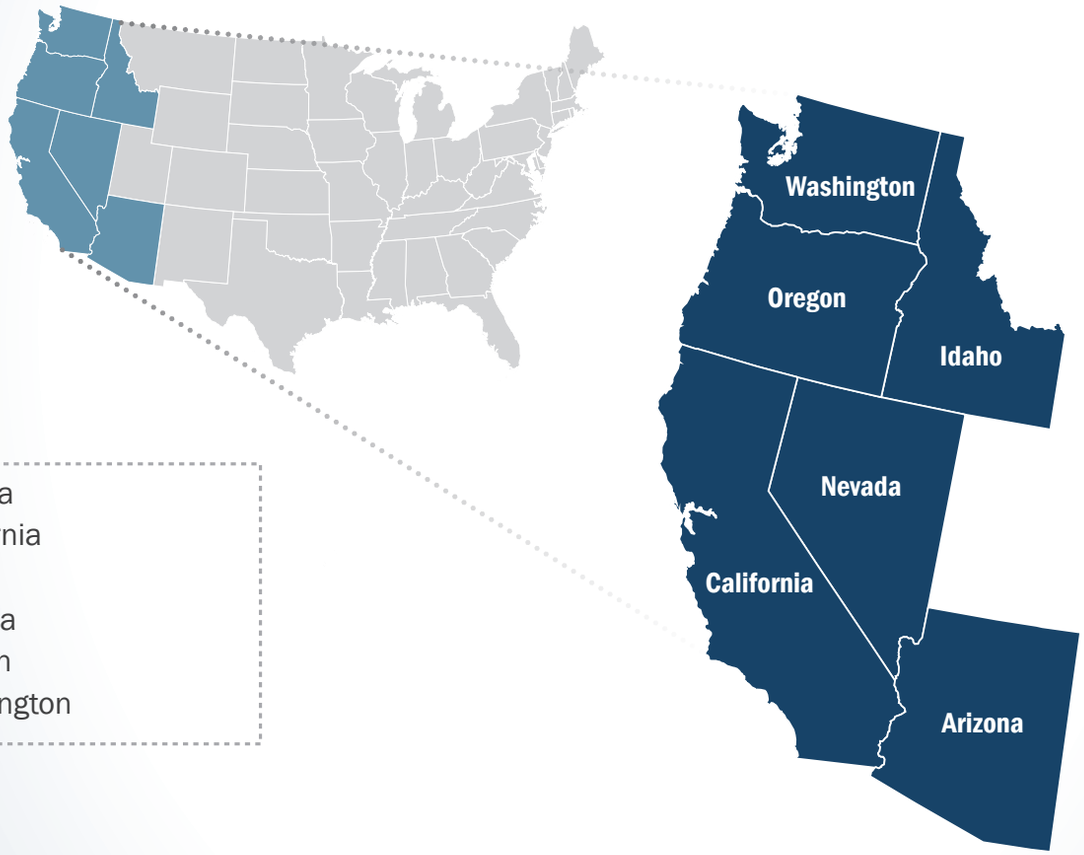
Nationwide Public Safety Broadband Network

Draft Programmatic Environmental Impact Statement for the Western United States

CHAPTER 12 - OTHER REQUIRED ANALYSES



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First Responder Network Authority

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Cooperating Agencies
Federal Communications Commission
General Services Administration
U.S. Department of Agriculture—Rural Utilities Service
U.S. Department of Agriculture—U.S. Forest Service
U.S. Department of Agriculture—Natural Resource Conservation Service
U.S. Department of Defense—Department of the Air Force
U.S. Department of Energy
U.S. Department of Homeland Security

September 2016

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12. OTHER REQUIRED ANALYSES

In addition to the analyses discussed in the previous state chapters, the National Environmental Policy Act (NEPA) requires an additional evaluation of the potential impacts from the Proposed Action related to unavoidable adverse impacts, any irreversible or irretrievable commitment of resources, and the relationship between local short-term and long-term productivity.

12.1. UNAVOIDABLE ADVERSE IMPACTS

The Council on Environmental Quality (CEQ) NEPA implementing regulations (40 Code of Federal Regulations [CFR] § 1502.16) require that an Environmental Impact Statement (EIS) evaluate the unavoidable adverse impacts from implementation of the Proposed Action. For this Proposed Action, the analysis indicates no significant or unavoidable adverse impacts are anticipated. Once site-specific project information is known, the potential for adverse impacts would be analyzed, as appropriate, in NEPA documentation tiered from this Programmatic EIS (PEIS).

12.2. IRREVERSIBLE OR IRRETRIEVABLE COMMITMENT OF RESOURCES

CEQ's NEPA implementing regulations (40 CFR § 1502.16) require that an EIS review the potential impacts to irreversible or irretrievable commitments of resources resulting from implementation of the Proposed Action. An irreversible commitment of resources refers to the loss of resource use in the future, whereas irretrievable refers to the loss of a natural resource for harvest, production, or use. These resources are irretrievable in that they would be used for a single project instead of being used for multiple purposes. An irretrievable commitment of resources is the loss of resources that cannot be replaced, recovered, or reversed. An example of irreversible commitments of resources could be the conversion of wetlands or the loss of a protected species or a cultural resource; these would be considered permanent losses.

The Proposed Action could require an irretrievable commitment of natural and manmade resources from direct consumption of fossil fuels and construction materials, depending on the deployment activities. These resources include potential building materials used during construction or renovation; energy (gas or electricity) consumed during construction and operation of facilities using mechanical systems; and human labor to develop, construct, and operate the proposed FirstNet projects as these contractors would be unable to work on other projects, and may cause temporary increases in the cost of local labor, equipment, or materials. These are considered irretrievably committed because their reuse for some other purpose would be highly unlikely. Potential resource commitments are shown on Table 12.2-1.

Where any potential irreversible or irretrievable commitments of resources are identified, they would be addressed in project specific environmental compliance documentation.

Table 12.2-1: Summary of Irreversible and Irretrievable Commitment of Resources by Resource Area

Resource Area	Irreversible Impacts	Irretrievable Impacts	Explanation
Infrastructure	No	No	Short-term obstruction or temporary disruption to local infrastructure could occur during construction of deployment activities. There would be no long-term impacts to infrastructure.
Soils	Yes	Yes	Soil lost due to potential erosion would be an irretrievable loss. There could be an irreversible commitment of resources if an undisturbed land area is selected for deployment activities.
Geology	Yes	Yes	Removal or disturbance of paleontological resources (fossils) could create irreversible and irretrievable impacts.
Water Resources and Wetlands	No	No	Deployment activities are not expected to cause any impacts to existing waterbodies, wetlands, or to exceed water quality standards.
Biological Resources	Yes	Yes	Removal or disturbance of habitat could create irreversible and irretrievable impacts.
Land Use and Recreation	Yes	No	Land use required for the deployment activities could be an irreversible impact.
Visual Resources	Yes	Yes	Obstruction of scenic or cultural areas could occur from some angles, resulting in an irreversible and irretrievable loss of visual resources. In addition, the installation of lighting in rural areas, may have irretrievable impacts to night skies.
Socioeconomic Resources	No	Yes	There could be an increased use of local contractors during construction activities, representing an irretrievable loss of workers during construction.
Environmental Justice	No	No	In general, Environmental Justice impacts across each state and the District would not include irreversible or irretrievable effects. Analyses of individual proposed projects should assess whether potential impacts to specific environmental justice communities include irreversible and/or irretrievable effects.
Cultural Resources	Yes	Yes	Removal or disturbance of previously unidentified cultural resources could result in irretrievable and irreversible impacts.
Air Quality	No	No	Project emissions are not expected to exceed federal or state air quality standards. Air quality would return to existing conditions after completion of deployment activities.
Noise	No	No	Short-term, temporary noise impacts may result during construction activities for deployment. There would be no long-term impacts to noise.
Climate Change	No	No	Greenhouse gas emissions are not expected to increase.
Human Health and Safety	No	No	Construction activities during deployment may increase human health and safety concerns. Any hazardous wastes would be disposed of properly. Conditions would return to normal after completion of deployment activities.

12.3. RELATIONSHIP BETWEEN SHORT-TERM AND LONG-TERM PRODUCTIVITY

CEQ's NEPA implementing regulations (40 CFR § 1502.16) require that an EIS address the relationship between short-term use of the environment and the potential impacts of such use on the maintenance and enhancement of long-term productivity, particularly for beneficial uses. Such impacts can arise from choosing one action that could reduce the flexibility of pursuing other options in the future, or from selecting a specific parcel of land or other resource to a certain use that would not allow other uses to occur at the site. It is anticipated that implementation of the Proposed Action would not result in any impacts that would narrow the range of future beneficial uses of the environment because it would not pose any long-term risks to the health, safety, or the general welfare of public communities. Deployment activities would follow, where practicable and feasible, the Best Management Practices (BMPs) and mitigation measures outlined in Chapter 9, as appropriate.

FirstNet does not intend to alter the current uses of the environment. Project-specific environmental compliance reviews would be conducted to ensure all environmental laws are met. During those reviews, each project element and activity would be evaluated, and the potential long-term effects on productivity of each environmental resource area would be disclosed and discussed relative to potential trade-offs.

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