

Appendix D

Public Involvement



Department of Energy
Western Area Power Administration
Desert Southwest Customer Service Region
P.O. Box 6457
Phoenix, AZ 85005-6457

October 13, 2016

SUBJECT: Scoping Letter for an Environmental Assessment, Historic Properties Review, and Notice of Floodplain and Wetland Action for WAPA's Crossman Peak Communication Facility (DOE/EA-2023)

Dear Interested Party:

This letter invites you to be involved in and provide input on environmental issues associated with the above-mentioned Federal action, which is further described below.

Western Area Power Administration (WAPA), Desert Southwest Region is a Federal power-marketing administration within the U.S. Department of Energy (DOE) that distributes electricity generated at Federal hydropower dams located along the Colorado River. We operate a microwave communication network in the 2320-2345 megahertz band to safely and reliably accomplish our mission, and we are shifting to the 7125-8025 megahertz band to free up spectrum for licensed commercial use. WAPA proposes to own, construct, operate, and maintain a new communication facility located adjacent to an existing, privately-owned one near Crossman Peak, east of Lake Havasu City in Mohave County, Arizona. This action is needed in order to bypass terrain that blocks equipment operating in the new band between our existing facilities.

The proposed action consists of three components:

- **Communication Facility.** WAPA plans to construct a communication facility composed of a 100-foot-tall, self-supporting tower with attachments such as microwave dishes, a prefabricated equipment shelter, a backup generator, a propane tank, and associated concrete slab foundations on a 0.1-acre parcel.
- **Access Road to Communication Facility.** WAPA plans to use an existing six-mile-long dirt access road across Arizona State Land Department, Bureau of Land Management (BLM) Lake Havasu Field Office, and private lands on the west side of Crossman Peak. On private land, WAPA plans to widen the road's switchback turns for safety.
- **Distribution Line and Access Road.** WAPA plans to contract with UniSource Energy Services (UNS) to provide electrical service to the communication facility. UNS would construct an approximately 14-mile-long, distribution line using 43-foot-tall steel or wood structures

across private and BLM land on the east side of Crossman Peak. It would connect to their existing Franconia Substation near Interstate 40. UNS would use existing roads to the extent possible and construct new dirt roads as needed.

WAPA will address the following planning requirements before construction starts:

- **Aesthetics:** WAPA will assess impacts to visual resources and ensure compliance with BLM's Resource Management Plan.
- **Clean Water Act:** WAPA will assess the proposed action's impacts, if any, to floodplains and wetlands and comply with the requirements of applicable U.S. Army Corps of Engineers Section 404 permits.
- **Endangered Species Act:** WAPA will evaluate threatened, endangered and other special status species and their habitat potentially affected by the proposed action and consult with the U.S. Fish and Wildlife Service as needed. WAPA plans to conduct a biological survey. We seek your observations about the occurrence of these species near the proposed action and suggestions to avoid or minimize adverse effects.
- **National Environmental Policy Act (NEPA):** WAPA will serve as lead Federal Agency in the preparation of an environmental assessment (EA) for the proposed action. BLM will be a Cooperating Agency.
- **National Historic Preservation Act (NHPA):** WAPA will serve as lead federal agency for Section 106 consultations with Indian tribes, State Historic Preservation Officers, and other parties. We plan to conduct an archaeological survey. WAPA invites you to be a consulting party and seeks your suggestions about available sources of cultural resource information and applicable types of identification efforts.

We anticipate that construction activities could begin as early as October 2017, provided the above-mentioned tasks are completed and no significant environmental effects are identified. Project information is available online:

<https://www.wapa.gov/regions/DSW/Environment/Pages/Crossman-Peak-Communications-Facility-Project.aspx>

We would like to know of any issues, concerns, and suggestions you may have regarding the proposed action. Your scoping comments will help define environmental issues and alternatives for consideration in the review processes. Comments can be provided in writing, by phone, or in person at the public scoping meeting (information below).

Mail: Western Area Power Administration
ATTN: Matthew Bilsbarrow, NEPA Document Manager
P.O. Box 6457
Phoenix, AZ 85005
Email: DSW-EA2023PublicComment@wapa.gov
Phone: (602) 605-2536
Fax: (602) 605-2630

WAPA will host an open-house style meeting to allow the public and interested parties an opportunity to learn about the proposed action, the NEPA process, the NHPA consultation process, and ask questions. The meeting will be held:

Tuesday, November 1, 2016, 5:00 – 7:00 pm
ASU Colleges at Lake Havasu City Gymnasium
100 University Way
Lake Havasu City, AZ 86403

WAPA prefers to receive your scoping comments by November 15, 2016, and we will also accept comments after this date. We intend to use your scoping comments to prepare a draft EA, which we expect to complete by February 17, 2017. After that, we will seek public comment on the analyses presented in the draft EA.

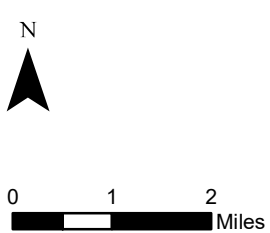
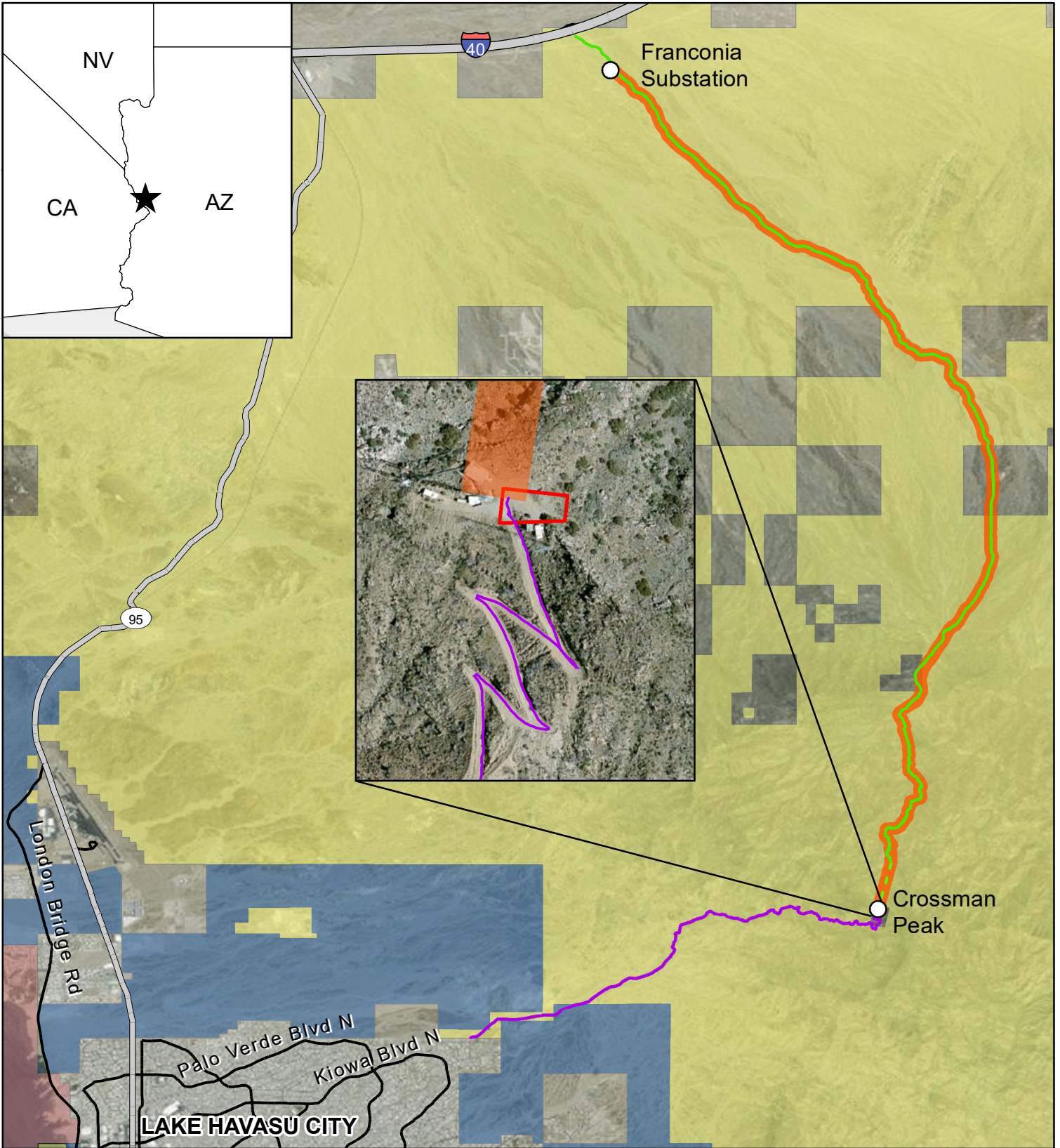
We look forward to receiving your comments and hope that you will attend the public scoping meeting.

Sincerely,

A handwritten signature in black ink that reads "Linda Marianito". The signature is written in a cursive, flowing style.

Linda Marianito
Environmental Manager

enclosure (map)



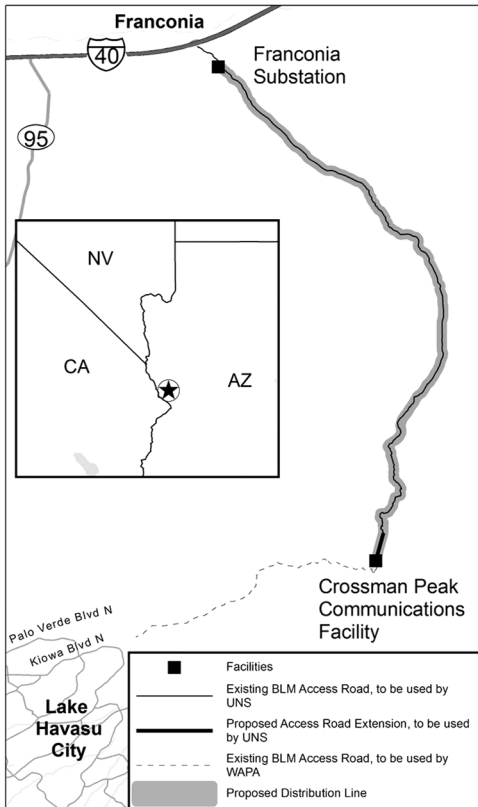
- Facilities
- Existing BLM Access Road, to be used by UNS
- - - Proposed Access Road Extension, to be used by UNS
- Proposed Distribution Line Corridor
- Existing BLM Access Road, to be used by WAPA
- Proposed Communications Facility Site

- Land Ownership**
- BLM
 - Private
 - State Trust
 - USFWS

**Crossman Peak
Communications Facility
Project**

DOE/EA-2023

REQUEST FOR COMMENTS AND PUBLIC OPEN HOUSE NOTICE



Western Area Power Administration, a power marketing administration within the U.S. Department of Energy, invites you to provide input on a proposed microwave communication facility to be built near Crossman Peak, east of Lake Havasu City, Mohave County, Arizona. As part of its preparation process for its Environmental Assessment, WAPA is conducting public scoping to gather additional information related to its proposal that involves environmental issues, historic properties, and floodplain or wetland impacts. This proposed Federal action would include:

- Building a 100-foot-tall, self-supporting tower with an equipment shelter on private land;
- Using an existing access road on the west side of Crossman Peak across Bureau of Land Management land and improving a dirt road on private land; and
- Constructing an electrical distribution line on the east side of Crossman Peak across BLM and private lands.

We would like to know any issues, concerns, and suggestions you may have regarding the proposed Federal action. Your comments help define issues and alternatives to be considered as part of the National Environmental Policy Act and National Historic Preservation Act review processes. Comments can be provided in writing, by phone, or in person at the public scoping open house (information below).

Mail: Western Area Power Administration,
Desert Southwest Region
ATTN: Matthew Bilsbarrow, NEPA Document Manager
PO Box 6457
Phoenix, AZ 85005
Email: DSW-EA2023PublicComment@wapa.gov
Phone: (602) 605-2536
Fax: (602) 605-2630

WAPA will host an open house where the public and interested parties can ask questions as well as learn more about the action and review processes. The public open house will be held:

Tuesday, November 1, 2016, 5:00 – 7:00 pm
ASU Colleges at Lake Havasu City Gymnasium
100 University Way
Lake Havasu City, AZ 86403

WAPA prefers to receive your scoping comments by November 15, 2016, and we will also accept comments after this date. We intend to use your scoping comments to prepare a draft EA, which we expect to complete by February 17, 2017.

Information about the action is available on WAPA's website at <https://www.wapa.gov/regions/DSW/Environment/Pages/Crossman-Peak-Communications-Facility-Project.aspx>

Public Open House Tuesday, November 1, 2016, 5 – 7 pm

NEWS Release

WESTERN AREA POWER ADMINISTRATION



FOR IMMEDIATE RELEASE: October 24, 2016
CONTACT: Kara Lamb, lamb@wapa.gov, 720.962.7411

Public Scoping Period Opens for Proposed Work on Crossman Peak

LAKEWOOD, Colorado – Western Area Power Administration is now collecting public comment on the proposed construction of a 100-foot tall communication tower next to an existing one situated on Crossman Peak, just east of Lake Havasu City, AZ. WAPA plans to use an existing access road to the proposed tower and construct a new electric distribution line with its separate access road. Comments received will help inform documents prepared in compliance with the National Environmental Policy Act and the National Historic Preservation Act.

“We are inviting the public to be involved in our environmental assessment process,” said Matthew Bilsbarrow, Environmental Planner for WAPA’s Desert Southwest region. “Any information regarding endangered species, floodplains, wetlands, views, historic sites and related concerns helps define issues and alternatives for consideration. Often, the public knows information we do not.”

Comments may be submitted in writing to the attention of Mr. Bilsbarrow via traditional mail or email:

P.O. Box 6457

Phoenix, AZ 85005

DSW-EA2023PublicComment@wapa.gov

WAPA is also hosting a public open house in Lake Havasu City on November 1, 2016 from 5 p.m. to 7 p.m. The open house provides another opportunity for learning about the proposal and submitting comments:

ASU Colleges at Lake Havasu City Gymnasium

100 University Way, Lake Havasu City, AZ.

WAPA is serving as the lead federal agency in the preparation of an environmental assessment, or EA, for the proposed action. Scoping is used to engage state, local and tribal governments and the public in the early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions. A primary purpose of NEPA is to inform the public about the environmental implications of federal agency decisions before they are made.

To learn more, please visit the Crossman Peak EA website

<https://www.wapa.gov/regions/DSW/Environment/Pages/Crossman-Peak-Communications-Facility-Project.aspx>, attend the public open house, or contact (720) 962-7411.

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About WAPA: Western Area Power Administration annually markets and transmits more than 25,000 gigawatt hours of clean, renewable power from 56 hydroelectric powerplants owned and operated by the Bureau of Reclamation and the U.S. Army Corps of Engineers in 15 western and central states. It is part of the Department of Energy. Follow us on Twitter @WesternAreaPowr or visit the website at www.wapa.gov

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Appendix E

Agency Correspondence



Department of Energy
Western Area Power Administration
Desert Southwest Customer Service Region
P.O. Box 6457
Phoenix, AZ 85005-6457

Kathryn Leonard
State Historic Preservation Officer
Arizona State Parks
1100 West Washington Street
Phoenix, Arizona 85007

MAR 21 2017

Re: National Register Evaluation and Finding of Affect per Section 106 of the National Historic Preservation Act regarding the Construction of a Communication Facility on Crossman Peak.

Dear Ms. Leonard:

In accordance with the National Historic Preservation Act, the Western Area Power Administration (WAPA) requests your review and concurrence regarding the construction, operation, and maintenance of a new communication facility located adjacent to the existing, privately owned communication facility on Crossman Peak (Undertaking). WAPA's proposed facility would compose of a 100-foot-tall, self-supporting tower with attachments such as microwave dishes, a prefabricated equipment shelter, a backup generator, a propane tank, and associated concrete slab foundations.

To access the proposed facility, WAPA proposes to use the existing dirt road and to widen the road's switchback turns near the top of Crossman Peak on privately owned land. To power the facility, WAPA proposes to contract UniSource Energy's services to construct a 14-mile-long by 44-foot-tall, steel and wood pole 20.8-kV distribution line across private and Bureau of Land Management (BLM) land on the east side of Crossman Peak. WAPA is the lead federal agency for this undertaking. Please see the enclosed cultural inventory report and/or environmental assessment for maps of the project area.

WAPA defines the area of potential effects to encompass the proposed location of the communication equipment, UniSource Energy's 14.7-mile-long by 50-ft-wide distribution line right-of-way corridor, 14.5 miles of existing access roads, 5.1 miles of newly construction access road, 22 temporary, 50-ft by 100-ft pulling/stringing areas, multiple staging areas, and the areas from which the newly introduced distribution line would be visible (Sections 6, 7, and 18, T14N, R18W; Sections 1, 13, 14, 15, 21, 22, 28, and 29, T14N, R19W; Sections 6, 7, 8, 17, 20, 29, 30, and 31, T15N, R18W; Section 1 T15N, R19W; and Sections 15, 16, 22, 25, 26, 27, 35, and 36, T16N, R19W, Gila and Salt River Baseline and Meridian (G&SRB&M) (USGS 7.5' Lake Havasu City North, Ariz., 1987; Crossman Peak, Ariz., 1983; and Buck Mountains, Ariz., 1978)). The area of potential effects crosses private lands and lands managed by the BLM-Lake Havasu Field Office and the Arizona State Lands Division. Please see the enclosed cultural inventory report and/or environmental assessment for maps and locational information.

Historic Property Identification Efforts:

WAPA acknowledges that Indian tribes possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them and sought information on historic properties within the area of potential effects. WAPA held a historic properties consultation meeting on November 17, 2016 in Lake Havasu. The goal of the meeting was to discuss the area of potential effects, identify historic properties potentially affected by the undertaking, and assess the effects. Though Crossman Peak is a known property of religious and cultural significance to Indian Tribes and an Area of

Critical Environmental Concern, WAPA did not receive information regarding the nature or characteristics that make the property of religious and cultural significance eligible for the National Register of Historic Places nor did WAPA receive information regarding this project's potential to affect the characteristics that make the property eligible for the National Register of Historic Places. Included within the enclosed Environmental Assessment is a viewshed analysis, visual simulation, listing of consulting parties, consulting party correspondences, and comments from the public.

WAPA's environmental contractor, Aspen Environmental (Aspen), performed a cultural resources inventory of the proposed location for the communication equipment, the distribution line right-of-way corridor, and the lands between the access roads and the distribution line right-of-way from November 29 to December 6, 2016. Though inspected from a distance, areas of slope greater than 30 percent were not physically surveyed for safety reasons and a total of 0.68 acres of four recently identified work areas/pull sites remain unsurveyed. In addition, Aspen performed a literature review for the project area and an additional half-mile radius. The literature review included archaeological site files, records, inventory reports, and databases at the BLM-Lake Havasu Field Office, the Arizona State Historic Preservation Office, and the Arizona State Museum. Aspen also reviewed the National Register Information System database, historic General Land Office plat maps, and historic topographic maps.

The literature review and cultural inventory identified one rock ring [AZ L:8:15 (ASM)], three historic road segments [AZ L:8:1(ASM), AZ L:8:2(ASM), AZ L:8:6(ASM)], and two historic mining sites [AZ L:8:7(ASM), AZ L:8:12 (ASM)] within or near the construction footprint of the distribution line and access road. In addition, a historic road segment [AZ L:7:70(ASM)], three historic mining sites [AZ L:7:60(ASM), AZ L:8:13 (ASM), AZ L:8:14 (ASM)], and one US Air Force radar tower site [AZ L:7:32(ASM)] were identified to be within a half-mile of the construction footprint for the distribution line and access road. Aspen did not rediscover three sites identified during the literature review [L:8:4(ASM), AZ L:8:5(ASM), AZ L:8:8(ASM)]. Sixteen isolate occurrences of cultural material (IOs) were documented during the inventory. Please see the enclosed cultural resources inventory report for detail descriptions, discussions on integrity, and National Register recommendations.

Based on results of the identification efforts, WAPA makes the following determinations of eligibility regarding, the properties identified above:

- AZ L:8:1(ASM) and AZ L:8:2(ASM) – WAPA determines that the portions of the in-use historic road segments that intersect the distribution line right-of-way and access road do not convey the properties' historic significance and **do not contribute** to the properties' eligibility for the National Register of Historic Places.
- AZ L:8:6(ASM) – The historic road segment was previously determined “**not eligible**” for inclusion in the National Register of Historic Places and new information, the passage of time, and changing perceptions do not presently warrant reevaluation.
- AZ L:8:14 (ASM) – WAPA determines that National Register Criteria A and D are applicable and the property shall be considered **eligible** for inclusion in the National Register of Historic Places upon concurrence by the State Historic Preservation Officer.
- AZ L:8:7(ASM) and AZ L:8:12 (ASM) – WAPA determines that National Register Criterion D is applicable and the property shall be considered **eligible** for inclusion in the National Register of Historic Places upon concurrence by the State Historic Preservation Officer.
- AZ L:8:13 (ASM) , AZ L:8:15 (ASM), and Sixteen IOs – WAPA determines that the National Register Criteria are not met and the properties shall be considered **not eligible** for inclusion in the National Register of Historic Places upon concurrence by the State Historic Preservation Officer.

- AZ L:7:70(ASM) and AZ L:7:32(ASM) – The historic sites lie outside of the survey area, but based on the enclosed site cards obtained from Arizona’s Cultural Resource Inventory (AZSITE), WAPA determines that the National Register Criteria are not met and the properties shall be considered **not eligible** for inclusion in the National Register of Historic Places upon concurrence by the State Historic Preservation Officer.
- AZ L:7:60(ASM) – The mining site lies outside of the survey area and is listed in AZSITE as “Ineligible Individually” (SHPO-2003-1725). Based on the literature review, WAPA cannot determine the National Register eligibility status for the site (**unevaluated**).

Description of the Undertaking’s Effects on Historic Properties:

Two of the eligible mining sites listed above [AZ L:8:7(ASM) and AZ L:8:12 (ASM) WAPA] are present within the APE and the installation of distribution line poles within the sites’ boundaries has the potential to affect the characteristics that make the sites eligible for the National Register under Criterion D. WAPA will ensure that a permitted archaeological contractor will flag significant features for avoidance and record any data discovered during the installation of the three distribution line poles within the site boundaries.

In addition, the existing access road to Crossman Peak runs through the Sunrise Mine [AZ L:8:14 (ASM)] and though WAPA will improve the switchbacks within the Sunrise Mine’s claim (as depicted on the historic General Land Office plot), no road improvements will occur within the newly recorded site boundaries. WAPA does not plan to implement any avoidance or minimization efforts for the Sunrise Mine [AZ L:8:14 (ASM)]. The undertaking will not affect any of the other historic properties listed above.

Finding of Effect:

Based upon the above information and the attached environmental assessment, cultural report, and site cards, the undertaking will not destroy, damage, alter, relocate, or change the character of any historic properties. Pursuant to 36 CFR 800.5(b), WAPA proposes a finding of “**no adverse effect**.”

WAPA is concurrently notifying all consulting parties of the finding of “no adverse effect.” Please provide concurrence or objections within 30 days of receiving this letter. If a consulting party disagrees with this notification, WAPA will consult with the party to resolve the disagreement. If no objections are received within the 30-day review period, WAPA will continue to engage the public, land managers, Indian Tribes, and other consulting parties regarding this Federal Action per the provisions of National Environmental Policy Act and other applicable regulations. If WAPA significantly modifies the undertaking as proposed in this finding of effect, WAPA will reopen consultation under the provisions of the National Historic Preservation Act.

If you have any questions, please feel free to contact the Regional Preservation Officer, Sean Berry, at (602) 605-2842| berry@wapa.gov or me at (602) 605-2524| marianito@wapa.gov.

Sincerely,



Linda Marianito,
Environmental Manager

3 Enclosures

1. A Class III Cultural Resources Inventory for the Western Area Power Administration Crossman Peak Distribution Line, Staging Areas, and Access Roads, Near Lake Havasu City, Mohave County, Arizona.
2. Environmental Assessment - DOE/EA-2023.
3. Site Cards for AZ L:7:70(ASM) and AZ L:7:32(ASM).



Department of Energy
Western Area Power Administration
Desert Southwest Customer Service Region
P.O. Box 6457
Phoenix, AZ 85005-6457

AUG 11 2015

Ms. Sheri Ahrens, Realty Specialist
Bureau of Land Management, Lake Havasu Field Office
2610 Sweetwater Avenue
Lake Havasu City, Arizona 86406-9071

RE: Invitation to be a Cooperating Agency or Request to be a Joint Lead Agency in Environmental Reviews for Western's Crossman Peak Communications Site.

Dear Ms. Ahrens:

Western Area Power Administration (Western) invites your agency to be a cooperating agency (per 40 CFR 1501.6) or request to be a joint lead agency (per 40 CFR 1501.5) in the environmental planning processes for Western's proposed Crossman Peak communications site project located near Lake Havasu City, Mohave County, Arizona. Your agency has jurisdiction by law over a portion of the project, because Western seeks the Bureau of Land Management's (BLM) authorization for an existing access road across BLM land and indirectly seeks authorization for a local utility's proposed distribution line across BLM land. Western submitted a SF-299 Application and a Plan of Development on July 14, 2015. Western and BLM are amending the Interagency Master Agreement dated June 10, 2010 to meet cost recovery requirements.

Brief Project Description

Western proposes to construct and operate a communications facility consisting of a 100-foot-tall tower with attachments, equipment building, backup generator, and propone tank situated on privately owned land. Western would acquire land and a road easement from the private land owner. Western plans to improve portion of the access road located on private land by widening the turnarounds at the ends of four switchbacks. This entails cutting into the hillside and adding a drainage ditch along the upslope side of the switchbacks.

Western plans to contract with Unisource Energy Source (UES) to provide electrical service to the proposed equipment building. This would entail UES constructing and operating a distribution line that crosses BLM and private land. UES would seek BLM authorization for the line. Feasible routes have not yet been determined.

Western applied for BLM authorization to use and maintain the existing unpaved access road from Lake Havasu City to Crossman Peak. Western does not plan to improve the portion of this road located on BLM land.

Western proposes to start construction on September 1, 2016 and place the facility in service no later than December 31, 2017.

Determining Roles

Western is prepared to act as lead agency or as joint lead agency for National Environmental Policy Act (NEPA) process, National Historic Preservation Act's (NHPA) Section 106 consultation process, and Endangered Species Act's (ESA) Section 7 processes for this project. Western determined that it should be a lead agency for the NEPA process based on the magnitude of its involvement. Western invites your agency to be a cooperating agency, and will consider a request to be a joint lead agency based on the criteria at 40 CFR 1501.5(c).

Given the scope of this environmental effort, Western does not propose preparing a Memorandum of Understanding between our two agencies. The roles and responsibilities of the two options are outlined below. Western will provide BLM with monthly updates and a schedule during the planning process.

Cooperating Agency Role

If your agency chooses to be a cooperating agency, Western expects your agency's involvement would entail only those areas under its jurisdiction and occur in a timely manner relative to the project schedule. This may include (per 40 CFR 1501.6(b)):

1. providing meaningful early input on defining the purpose and need, determining alternatives, and analytical methods;
2. participating in any public scoping meetings, coordination meetings and joint field reviews, as appropriate; and
3. providing timely review and comments on draft documents.

Your agency would decide whether or not to adopt the resulting NEPA document and issue its own decision document.

As a cooperating agency, you have the right to expect that the NEPA, NHPA and ESA documents that Western prepares would enable your agency to discharge its jurisdictional responsibilities. Likewise, your agency has the obligation to tell us, if, at any point in the process that your needs are not being met.

Joint Lead Agency Role

If your agency requests to be a joint lead agency, Western expects your agency's involvement would occur in a timely manner relative to the project schedule. In addition to the above items for a cooperating agency, this may include:

1. Co-signing official correspondence and notices;
2. Co-leading meetings and field reviews, as appropriate; and
3. Co-writing and editing documents.

Please note that Western has hired a contractor to draft a NEPA document for this project.

Determining Level of NEPA Review

According to Western's NEPA regulations (10 CFR Part 1021), the initial starting point for this project type could be the Categorical Exclusion level. Please determine your agency's NEPA level. Western recognizes that if two agencies requirements are different, then Western needs to meet the higher of the two.

Looking Ahead

Western looks forward to working with your agency in the planning processes for this project. Please indicate your agency's role and NEPA level on the enclosed form. If you have any questions, contact Environmental Planner Mr. Matthew Bilsbarrow at 602-605-2536 or email at bilsbarrow@wapa.gov or myself at 602-605-2524 or marianito@wapa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda J. Marianito". The signature is written in a cursive, flowing style.

Linda J. Marianito
Environmental Manager

Enclosure

Invitation to be a Cooperating Agency or Request to be a Joint Lead Agency in Environmental Reviews for Western's Crossman Peak Communications Site near Lake Havasu City, Mohave County, Arizona

Please indicate your agency's role and National Environmental Policy Act (NEPA) level below:

Determining Roles:

- Accept Western's invitation to be a Cooperating Agency
- Request to be a Joint Lead Agency (specify criteria at 40 CFR 1501.5(c))
- Other (describe below)

Determining Level of NEPA Review:

- Categorical Exclusion
- Environmental Assessment
- Environmental Impact Statement

Sign: Kimber Liebhauser Date: 8/18/15

Name: Kimber Liebhauser Title: Field Manager

Comments (e.g., reason for rejection, clarification of jurisdiction or expertise, point of contact information):

Point of contact will be Sheri Ahrens
at 928-505-1284 email sahrens@blm.gov



THE COCOPAH INDIAN TRIBE
Cultural Resource Department
14515 S. Veterans Drive
Somerton, Arizona 85350
Telephone (928) 722-7521
Fax (928) 627-3173

CCR-035-16-004
Via Electronic Transmittal

October 19, 2016

Ms. Linda Marianito
Environmental Manager
Western Area Power Administration - Headquarters
P.O. Box 6457
Phoenix, AZ 85006

RE: Invitation to be a Consulting Party per Section 106 of the National Historic Preservation Act regarding the Construction of a Communication Facility on Crossman Peak

Dear Ms. Marianito:

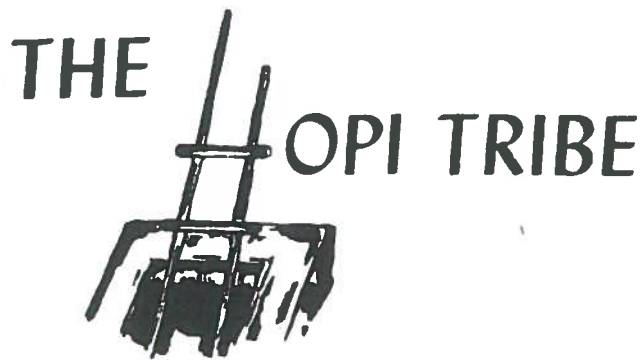
The Cultural Resources Department of the Cocopah Indian Tribe appreciates your consultation efforts on this project. We are pleased that you contacted the Cocopah on this cultural resource issue for the purpose of solicitation of our input and to address our concerns on this matter. At this time, we wish to make the following comments on the sites within the above referenced project and defer to the more local Tribe(s) for decision making power in this project.

If you have any questions or need additional information, please feel free to contact the Cultural Resource Department. We will be happy to assist you with any future concerns or questions.

Sincerely,

A handwritten signature in blue ink that reads "H. Jill McCormick".

H. Jill McCormick, M.A.
Cultural Resource Manager



Herman G. Honanie
CHAIRMAN

Alfred Lomahquahu Jr.
VICE-CHAIRMAN

October 20, 2016

Linda J. Marianito, Environmental Manager
Attention: Matthew Billsbarrow, NEPA Document Manager
Western Area Power Administration, Desert Southwest Customer Service Region
P.O. Box 6457
Phoenix, Arizona 85005-6457

Re: Communication Facility on Crossman Peak

Dear Manager Marianito,

This letter is in response to your correspondence dated October 12, 2016, regarding Western Area Power Administration (WAPA) proposing to construct, own, operate and maintain a new communications facility on Crossman Peak east of Lake Havasu City in Mohave County. The Hopi Tribe claims cultural affiliation earlier identifiable cultural groups in Arizona. The Hopi Cultural Preservation Office supports the identification and avoidance of our ancestral sites and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate WAPA's continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office is interested in consulting on any proposal in Arizona that has the potential to adversely affect prehistoric sites. We understand the project area will be surveyed for cultural resources. Therefore, we look forward to receiving a copy of the cultural resources survey report for review and comment. If prehistoric cultural resources are identified that will be adversely affected by project activities, we request continuing consultation including being provided with a copy of any proposed treatment plans for review and comment. If you have any questions or need additional information, please contact Terry Morgart at 928-734-3619 or tmorgart@hopi.nsn.us. Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink, which appears to read "Leigh J. Kuwanwisiwma". The signature is fluid and somewhat stylized, with a large loop at the end.

Leigh J. Kuwanwisiwma, Director
Hopi Cultural Preservation Office

xc: Arizona State Historic Preservation Office



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

5000 W. CAREFREE HIGHWAY
PHOENIX, AZ 85086-5000
(602) 942-3000 • WWW.AZGFD.GOV

GOVERNOR

DOUGLAS A. DUCEY

COMMISSIONERS

CHAIRMAN, EDWARD "PAT" MADDEN, FLAGSTAFF

JAMES R. AMMONS, YUMA

JAMES S. ZIELER, ST. JOHNS

ERIC S. SPARKS, TUCSON

KURT R. DAVIS, PHOENIX

DIRECTOR

LARRY D. VOYLES

DEPUTY DIRECTOR

TY E. GRAY



November 15, 2016

Mathew Bilbarrow
NEPA Document Manager
Western Area Power Administration
P.O. Box 6457
Phoenix, AZ 85005

Re: Review of WAPA's Crossman Peak Communication Facility

Dear Mr. Bilbarrow:

The Arizona Game and Fish Department (Department) reviewed your Project Evaluation Request letter dated October 13, 2016, regarding the proposed communication facility and associated access road and distribution line in Mohave County, AZ. As seen on the Department's Heritage Data Management System (HDMS)'s On-Line Environmental Tool report generated for you (enclosed) on November 14, 2016, Sonoran desert tortoise (*Gopherus morafkai*) have been reported within a two mile radius of your proposed project.

Based on the information provided, the Department offers the following general recommendations:

- The Department recommends conducting a survey for Sonoran desert tortoise within suitable habitat, in accordance with the *Desert Tortoise Survey Guidelines for Environmental Consultants*, to determine the presence/absence of this species. If tortoise are identified during the survey, please refer and adhere to *The Recommended Standard Mitigation Measures For Projects In Sonoran Desert Tortoise Habitat and Guidelines For Handling Sonoran Desert Tortoises Encountered On Development Projects*.
<http://www.azgfd.gov/hgis/documents/2010SurveyGuidelinesForConsultants.pdf>
http://www.azgfd.gov/pdfs/w_c/tortoise/MitigationMeasures.pdf
<https://www.azgfd.com/PortalImages/files/wildlife/2014%20Tortoise%20handling%20guidelines.pdf>
- The Mohave Mountains provides suitable habitat for golden eagles (*Aquila chrysaetos*), which are regulated under the Bald and Golden Eagle Protection Act (BGEPA), and other raptor species covered under the Migratory Bird Treaty Act (MBTA). Construction within the Mohave Mountains may impact nesting and/or foraging raptors, especially if power poles and other equipment will be flown in via helicopter. The Department recommends coordination with our Raptor Management Coordinator, Mr. Kenneth "Tuk" Jacobson, during development of the Environmental Assessment, to identify survey needs

and avoidance measures for raptors in the vicinity. Mr. Jacobson's contact information is KJacobson@azgfd.gov and 623-236-7575.

- Additionally, the distribution line must be designed to prevent or minimize risk of electrocution of raptors and other avian species. The Department recommends following the guidelines set forth in "*Suggested Practices for Raptor Protection on Power Lines and Mitigating Bird Collisions with Power Lines*", available at <http://aplic.org>.
- Desert bighorn sheep (*Ovis canadensis nelson*) inhabit the Mohave Mountains. No construction activities, especially the use of a helicopter to transport equipment, shall occur within the Mohave Mountains during February and March, when bighorn sheep are lambing. Additionally, if construction must be conducted during January and April, the Department requests coordination with the Department's Regional Terrestrial Wildlife Program Manager, Mr. Jeff Pebworth, at JPebworth@azgfd.gov and 928-263-8853, to insure impacts to lambing activities would be avoided during construction.
- The Department is concerned about the possible effects of facility lighting on nocturnal wildlife. Artificial night lighting may attract insects and the species that prey on them (e.g. bats). It could also impair the ability of nocturnal animals to navigate, and may negatively affect reptile populations. The Department recommends using only the minimum amount of light needed for safety. Narrow spectrum bulbs should be used as often as possible to lower the range of species affected by lighting. All lighting should be shielded, canted, or cut to ensure that light reaches only areas needing illumination.
- Minimize impacts to vegetation during project construction. Staging areas should be located in previously disturbed sites, and kept as small as possible. Implement erosion and drainage control measures during the project to prevent the introduction of sediment-laden runoff into adjacent surface waters, and to prevent impacts to surface water quality. Stabilize exposed soils, particularly on slopes, with native vegetation as soon as possible to prevent excess erosion.
- If proposed ground disturbance (both temporary and permanent), in areas with native vegetation, will meet or exceed 0.25 acre, please comply with the Arizona Native Plant Law (<https://agriculture.az.gov/programs-and-services/native-plants>) regulations. Please determine if a Native Plant Inventory should be conducted to identify, record, and coordinate plant salvage efforts for species that are Protected under the Arizona Native Plant Law. In addition, the applicable land management agencies should be consulted regarding guidelines for revegetation efforts.
- Minimize the potential introduction or spread of exotic invasive species, including aquatic and terrestrial plants, animals, insects and pathogens. Precautions should be taken to wash and/or decontaminate all equipment utilized in the project activities before entering and leaving the site. To view a list of documented invasive species in or near your project area visit <http://login.imapinvasives.org/azimi/login/?next=/azimi/>. To build a list: login, go to Query and Reports, select a geography value relevant to your project area, and select "View Report" for a list of reported exotic invasive species.
 - Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245); please see the Arizona Department of Agriculture website for prohibited and restricted noxious weeds.
<https://agriculture.az.gov/r3-4-244-regulated-and-restricted-noxious-weeds>
<https://agriculture.az.gov/r3-4-245-prohibited-noxious-weeds>

Mr. Bilbarrow
November 15, 2016
3

- In addition, please refer to USFWS's *Endangered Species Act and Cellular Communication Tower Guidance in Arizona*, as well as guidance for compliance with the Migratory Bird Treaty Act, which includes a Tower Site Evaluation Form.
<http://www.fws.gov/southwest/es/arizona/CellTower.htm>
<http://www.fws.gov/habitatconservation/communicationtowers.html>

The Department appreciates the opportunity to provide an evaluation of impacts to wildlife or wildlife habitats associated with the WAPA's Crossman Peak Communication Facility project. If you have any questions regarding this letter, please contact me at (623) 236-7615, and visit our website for additional guidelines at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/>.

Sincerely,



Cheri A. Bouchér
Project Evaluation Program Specialist, Habitat Branch
Arizona Game and Fish Department

cc: Laura Canaca, Project Evaluation Program Supervisor
Deanna Kephart, Habitat Program Manager, Region III
Jeff Pebworth, Terrestrial Wildlife Program Manager, Region III
Tuk Jacobson, Raptor Management Coordinator

AGFD# M16-10190601

Arizona Environmental Online Review Tool Report



Arizona Game and Fish Department Mission

To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

Project Name:

WAPA Crossman Peak Communication Facility

Project Description:

Cell tower, access road, 14-mile long power distribution line

Project Type:

Communication, Cell or communication tower including access roads, New tower

Contact Person:

Cheri Boucher

Organization:

Arizona Game and Fish Department

On Behalf Of:

OTHER_FED

Project ID:

HGIS-04479

Please review the entire report for project type and/or species recommendations for the location information entered. Please retain a copy for future reference.

Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. HabiMap Arizona data, specifically Species of Greatest Conservation Need (SGCN) under our State Wildlife Action Plan (SWAP) and Species of Economic and Recreational Importance (SERI), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

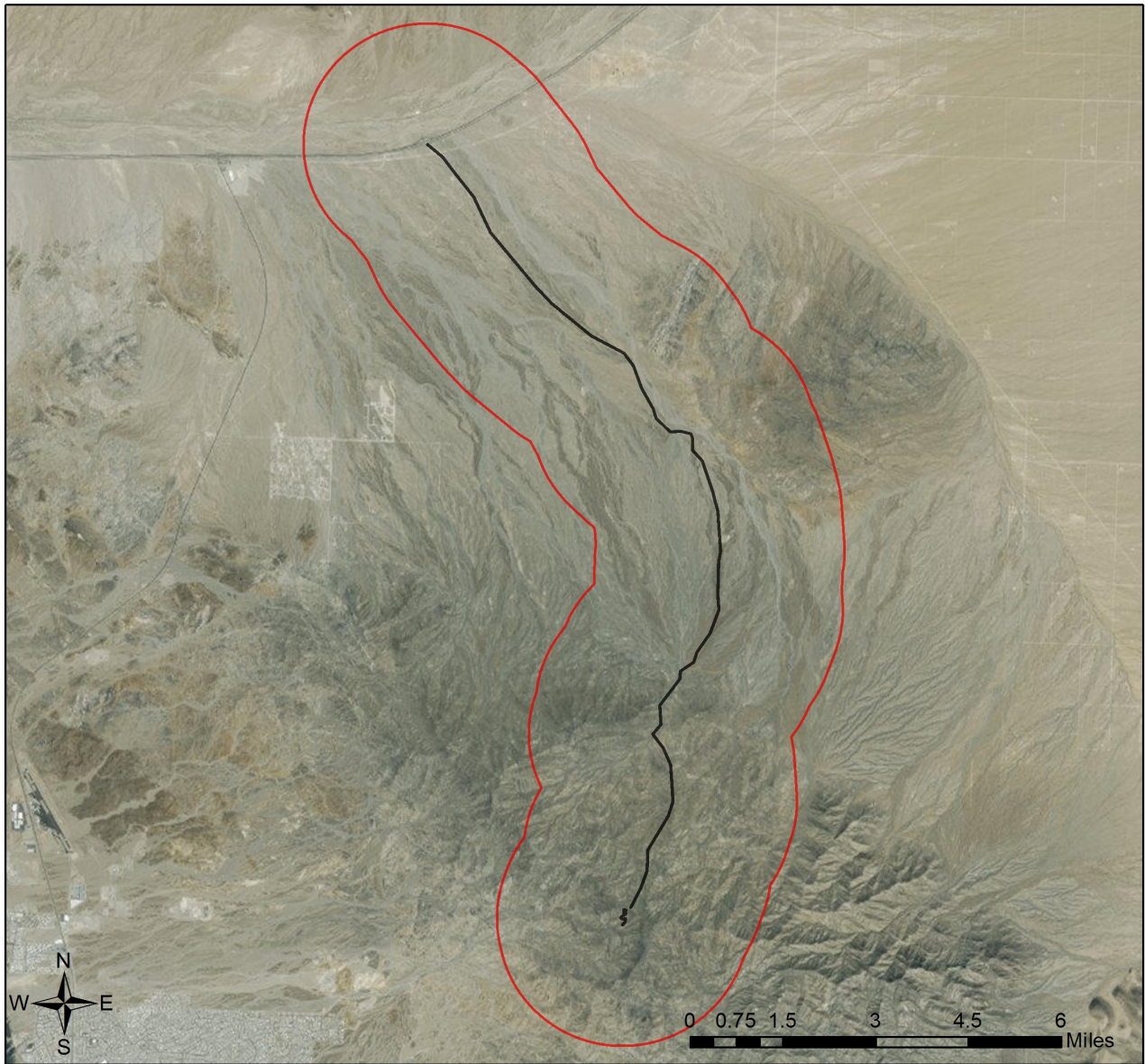
Locations Accuracy Disclaimer:



Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:
Project Evaluation Program, Habitat Branch
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086-5000
Phone Number: (623) 236-7600
Fax Number: (623) 236-7366
Or
PEP@azgfd.gov
6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies

WAPA Crossman Peak Communication Facility Aerial Image Basemap With Locator Map



-  Project Boundary
-  Buffered Project Boundary

Project Size (acres): 102.97

Lat/Long (DD): 34.6923 / -114.2139

County(s): Mohave

AGFD Region(s): Kingman

Township/Range(s): T16N, R19W; T15N, R19W; T15N, R18W +

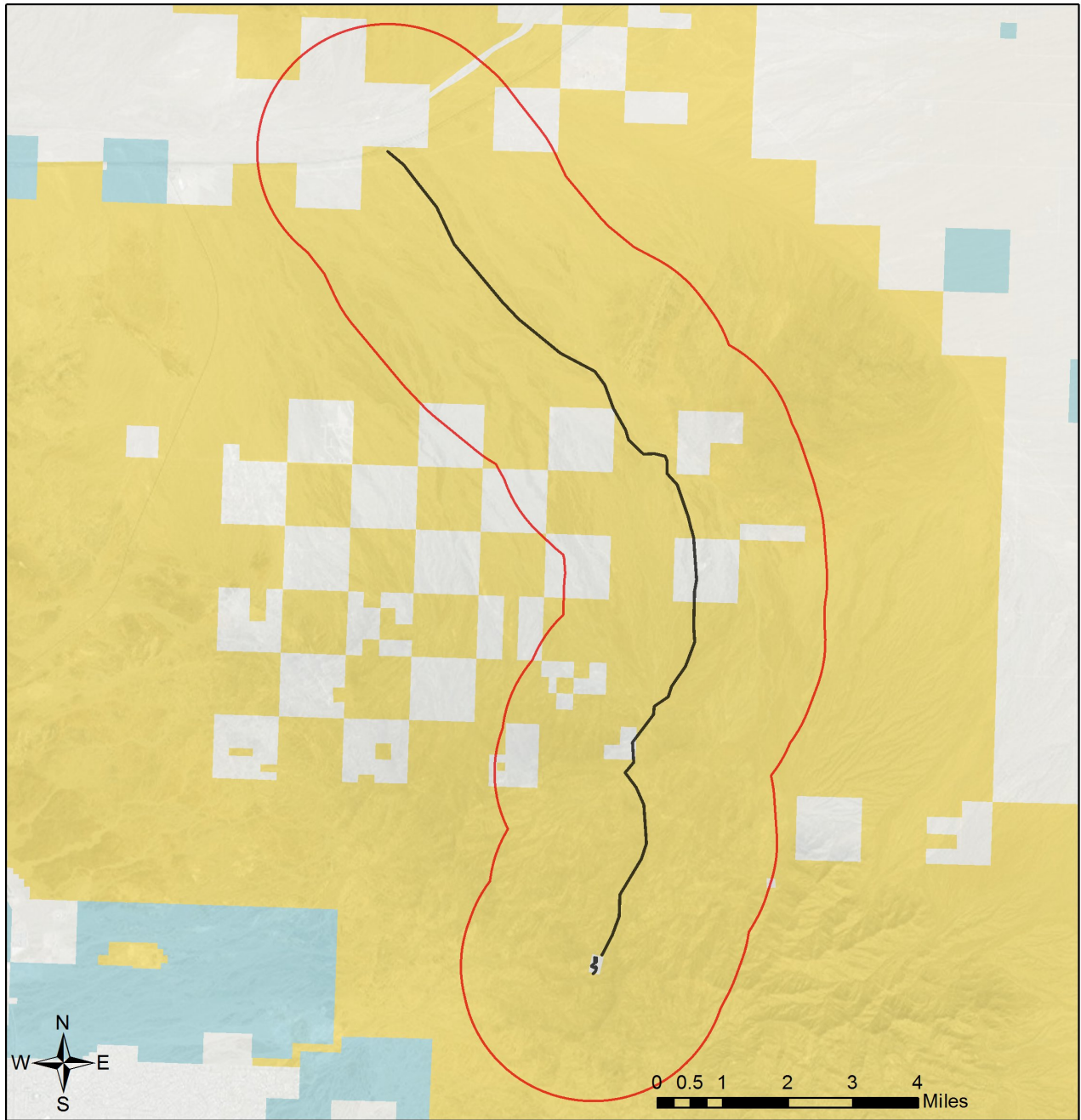
USGS Quad(s): FRANCONIA; BUCK MOUNTAINS +

Service Layer Credits: Sources: Esri, HERE, DeLorme, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong),



WAPA Crossman Peak Communication Facility

Web Map As Submitted By User



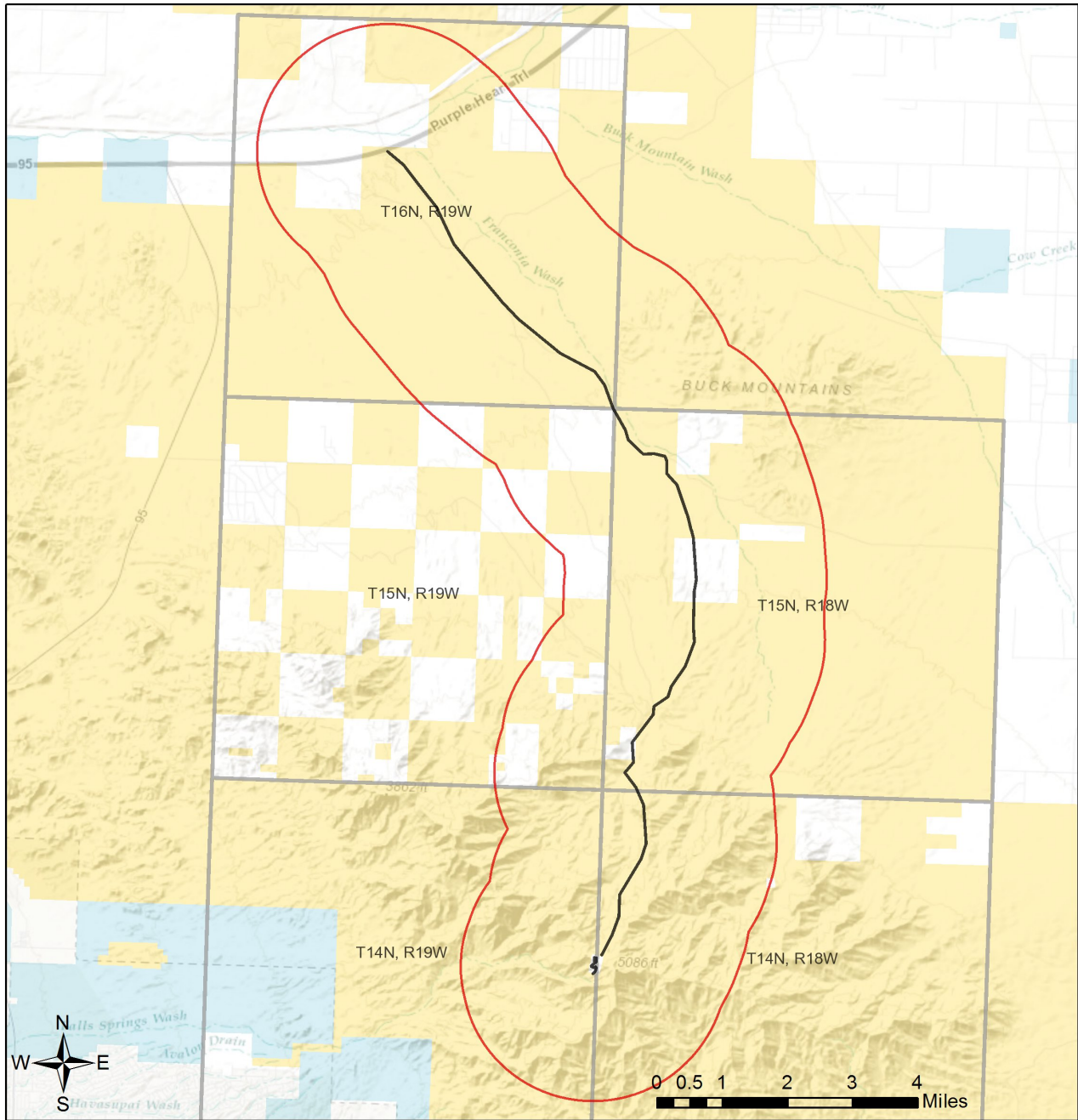
- | | |
|---|---|
| Project Boundary | Mixed/Other |
| Buffered Project Boundary | National Park/Mon. |
| AZ Game and Fish Dept. | Private |
| BLM | State and Regional Parks |
| BOR | State Trust |
| Indian Res. | US Forest Service |
| Military | Wildlife Area/Refuge |

Project Size (acres): 102.97
 Lat/Long (DD): 34.6923 / -114.2139
 County(s): Mohave
 AGFD Region(s): Kingman
 Township/Range(s): T16N, R19W; T15N, R19W; T15N, R18W +
 USGS Quad(s): FRANCONIA; BUCK MOUNTAINS +

Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community
 Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

WAPA Crossman Peak Communication Facility

Topo Basemap With Township/Ranges and Land Ownership



- | | |
|---------------------------|--------------------------|
| Project Boundary | Mixed/Other |
| Buffered Project Boundary | National Park/Mon. |
| Township/Ranges | Private |
| AZ Game and Fish Dept. | State and Regional Parks |
| BLM | State Trust |
| BOR | US Forest Service |
| Indian Res. | Wildlife Area/Refuge |
| Military | |

Project Size (acres): 102.97
 Lat/Long (DD): 34.6923 / -114.2139
 County(s): Mohave
 AGFD Region(s): Kingman
 Township/Range(s): T16N, R19W; T15N, R19W; T15N, R18W +
 USGS Quad(s): FRANCONIA; BUCK MOUNTAINS +

Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Special Status Species and Special Areas Documented within 2 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Allium parishii	Parish Onion			S	SR	
Bat Colony						
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	S	S		1B
Gopherus morafkai	Sonoran Desert Tortoise	CCA	S			1A

Note: Status code definitions can be found at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/>

**Species of Greatest Conservation Need
 Predicted within Project Vicinity based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Ammospermophilus harrisi	Harris' Antelope Squirrel					1B
Anthus spragueii	Sprague's Pipit	C*				1A
Antilocapra americana americana	America Pronghorn					1B
Aquila chrysaetos	Golden Eagle	BGA		S		1B
Aspidoscelis flagellicauda	Gila Spotted Whiptail					1B
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		1B
Botaurus lentiginosus	American Bittern					1B
Buteo regalis	Ferruginous Hawk	SC		S		1B
Castor canadensis	American Beaver					1B
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S			1A
Colaptes chrysoides	Gilded Flicker			S		1B
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	S	S		1B
Crotalus cerberus	Arizona Black Rattlesnake					1B
Empidonax traillii extimus	Southwestern Willow Flycatcher	LE				1A
Euderma maculatum	Spotted Bat	SC	S	S		1B
Eumops perotis californicus	Greater Western Bonneted Bat	SC		S		1B
Falco peregrinus anatum	American Peregrine Falcon	SC	S	S		1A
Gopherus morafkai	Sonoran Desert Tortoise	CCA	S			1A
Haliaeetus leucocephalus	Bald Eagle	SC, BGA	S	S		1A
Heloderma suspectum	Gila Monster					1A
Idionycteris phyllotis	Allen's Lappet-browed Bat	SC	S	S		1B
Incilius alvarius	Sonoran Desert Toad					1B
Kinosternon sonoriense sonoriense	Desert Mud Turtle			S		1B
Lasiurus blossevillii	Western Red Bat		S			1B
Lasiurus xanthinus	Western Yellow Bat		S			1B
Laterallus jamaicensis coturniculus	California Black Rail	SC		S		1B
Macrotus californicus	California Leaf-nosed Bat	SC		S		1B
Melanerpes uropygialis	Gila Woodpecker					1B

**Species of Greatest Conservation Need
 Predicted within Project Vicinity based on Predicted Range Models**

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Melospiza lincolnii	Lincoln's Sparrow					1B
Melospiza aberti	Abert's Towhee		S			1B
Microtus mexicanus	Mexican Vole					1B
Myotis occultus	Arizona Myotis	SC		S		1B
Myotis velifer	Cave Myotis	SC		S		1B
Myotis yumanensis	Yuma Myotis	SC				1B
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					1B
Passerculus sandwichensis	Savannah Sparrow					1B
Perognathus amplus	Arizona Pocket Mouse					1B
Perognathus longimembris	Little Pocket Mouse					1B
Rallus obsoletus yumanensis	Yuma Ridgeway's Rail	LE				1A
Setophaga petechia	Yellow Warbler					1B
Tadarida brasiliensis	Brazilian Free-tailed Bat					1B
Toxostoma lecontei	Le Conte's Thrasher					1B
Troglodytes pacificus	Pacific Wren					1B
Vireo bellii arizonae	Arizona Bell's Vireo					1B
Vulpes macrotis	Kit Fox					1B

Species of Economic and Recreation Importance Predicted within Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
Odocoileus hemionus	Mule Deer					
Ovis canadensis nelsoni	Nelson Desert Bighorn Sheep					
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	Mourning Dove					

Project Type: Communication, Cell or communication tower including access roads, New tower

Project Type Recommendations:

Consider impacts of outdoor lighting on wildlife and develop measures or alternatives that can be taken to increase human safety while minimizing potential impacts to wildlife. Conduct wildlife surveys to determine species within project area, and evaluate proposed activities based on species biology and natural history to determine if artificial lighting may disrupt behavior patterns or habitat use. Use only the minimum amount of light needed for safety. Narrow spectrum bulbs should be used as often as possible to lower the range of species affected by lighting. All lighting should be shielded, cantered, or cut to ensure that light reaches only areas needing illumination.

Consider tower designs and/or modifications that reduce or eliminate impacts to migratory birds (i.e. free standing, minimally lighted structures).

Minimize potential introduction or spread of exotic invasive species. Invasive species can be plants, animals (exotic snails), and other organisms (e.g., microbes), which may cause alteration to ecological functions or compete with or prey upon native species and can cause social impacts (e.g., livestock forage reduction, increase wildfire risk). The terms noxious weed or invasive plants are often used interchangeably. Precautions should be taken to wash all equipment utilized in the project activities before leaving the site. Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245). See Arizona Department of Agriculture website for restricted plants, <https://agriculture.az.gov/>. Additionally, the U.S. Department of Agriculture has information regarding pest and invasive plant control methods including: pesticide, herbicide, biological control agents, and mechanical control, <http://www.usda.gov/wps/portal/usdahome>. The Department regulates the importation, purchasing, and transportation of wildlife and fish (Restricted Live Wildlife), please refer to the hunting regulations for further information <https://www.azgfd.com/hunting/regulations>.

The Department recommends that wildlife surveys are conducted to determine if noise-sensitive species occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

Based on the project type entered, coordination with State Historic Preservation Office may be required (<http://azstateparks.com/SHPO/index.html>).

Based on the project type entered, coordination with U.S. Fish and Wildlife Service (Migratory Bird Treaty Act) may be required (<http://www.fws.gov/southwest/es/arizona/>).

Vegetation restoration projects (including treatments of invasive or exotic species) should have a completed site-evaluation plan (identifying environmental conditions necessary to re-establish native vegetation), a revegetation plan (species, density, method of establishment), a short and long-term monitoring plan, including adaptive management guidelines to address needs for replacement vegetation.

Project Location and/or Species Recommendations:

HDMS records indicate that one or more native plants listed on the Arizona Native Plant Law and Antiquities Act have been documented within the vicinity of your project area. Please contact:

Arizona Department of Agriculture

1688 W Adams St.

Phoenix, AZ 85007

Phone: 602.542.4373

<https://agriculture.az.gov/environmental-services/np1>

HDMS records indicate that Sonoran Desert Tortoise have been documented within the vicinity of your project area. Please review the Tortoise Handling Guidelines found at: <https://www.azgfd.com/wildlife/nongamemanagement/tortoise/>

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052



FEMA

November 9, 2016

Matthew Billsbarrow, NEPA Document Manager
Western Area Power Administration
P. O. Box 6457
Phoenix, Arizona 85005

Dear Mr. Billsbarrow:

This is in response to your request for comments regarding the Scoping Letter for an Environmental Assessment, Historic Properties Review, and Notice of Floodplain and Wetland Action for WAPA's Crossman Peak Communication Facility (DOE/EA-2023).

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the City of Lake Havasu City (Community Number 0040116), Maps revised December 12, 2015 and Mohave County (Community Number 040058), Maps revised June 16, 2016. Please note that the City of Lake Havasu City, Mohave County, Arizona is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

Matthew Bilsbarrow, NEPA Document Manager

Page 2

November 9, 2016

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Lake Havasu City floodplain manager can be reached by calling J. Greg Froslic, P.E., City Engineer, at (928) 453-6660. The Mohave County floodplain manager can be reached by calling Nicholas S. Hont, P.E., Director, Development Services, at (928) 757-0903 extension 5819.

If you have any questions or concerns, please do not hesitate to call Patricia Rippe of the Mitigation staff at (510) 627-7015.

Sincerely,



Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:

J. Greg Froslic, P.E., City Engineer, Lake Havasu City
Nicholas S. Hont, P.E., Director, Development Services, Mohave County
Brian Cosson, NFIP State Coordinator, AZ Department of Water Resources
Patricia Rippe, Senior NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, U.S. ARMY CORPS OF ENGINEERS
3636 NORTH CENTRAL AVENUE, SUITE 900
PHOENIX, AZ 85012-1939

November 17, 2016

Ms. Linda Marianito
Western Area Power Administration
Desert Southwest Customer Service Region
P.O. Box 6457
Phoenix, Arizona 85005-6457

DETERMINATION OF NEED FOR A DEPARTMENT OF THE ARMY PERMIT

Dear Ms. Marianito:

I am responding to your request (File No. SPL-2016-00784) dated October 13, 2016 for clarification whether a Department of the Army Permit is required for the Crossman Peak Communication Facility project (34.5492°N, -114.1875°W) located near Crossman Peak, east of Lake Havasu City in Mohave County, Arizona.

The Corps' evaluation process for determining if you need a permit is based on whether or not the proposed project is located within or contains a water of the United States, and whether or not the proposed project includes an activity potentially regulated under Section 10 of the River and Harbor Act or Section 404 of the Clean Water Act. If both conditions are met, a permit would be required.

At this time, I am unable to determine if waters of the U.S. occur on site. In order for me to complete a jurisdictional determination (JD), please provide the information requested on the attached additional information request form. Please note there are two types of JD you may request, an approved JD or a preliminary JD. An approved JD is appealable and is generally valid for five years per Regulatory Guidance Letter 05-02. A preliminary JD is advisory only and cannot be appealed (see attached preliminary JD form). A preliminary JD also may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service prior to starting work.

Based on the information you provided, I am unable to determine if the proposed project would be regulated under Section 404 of the Clean Water Act or Section 10 of the River and Harbor Act. In order for me to complete this evaluation, please provide the information requested on the attached additional information request form.

If you have any questions, please contact me at 602-230-6952 or via e-mail at Anne.T.Carpenter@usace.army.mil.

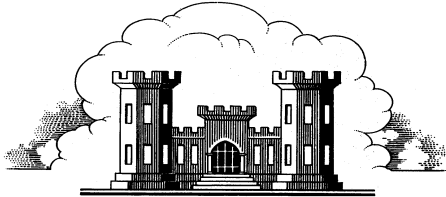
Please help me to evaluate and improve the regulatory experience for others by completing the customer survey form at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey.

Sincerely,

Sallie Diebolt
Chief, Arizona Branch
Regulatory Division

Enclosures

cc: Matthew Bilbarrow, NEPA Document Manager



Guidelines for Preliminary Jurisdictional Determinations
U.S. Army Corps of Engineers (ACOE)
Regulatory Division, Arizona Branch

National guidance for the processing of Jurisdictional Determinations (JDs) is described in Regulatory Guidance Letter 08-02 (RGL 08-02). This guidance letter is available online at http://www.usace.army.mil/Missions/CivilWorks/RegulatoryProgramandPermits/juris_info.aspx. The review and processing of your Preliminary Jurisdictional Determination (PJD) will be facilitated if you follow the guidelines recommended by the Arizona Branch.

Notes:

- Please upload electronic copy to - <https://safe.amrdec.army.mil/safe/>
- PJD request requires aerial photograph(s) of project area (electronic or 2 hardcopies).
- PJD request requires only one copy of PJD request letter and all other supporting documentation/reports (electronic or hardcopy).
- All JD requests will be considered as a PJD unless an Approved "Rapanos" Jurisdictional Delineation is specifically requested.
- Do not "bind" information/reports submitted to Army Corps of Engineers (ACOE). Binder clips are preferred.
- Cultural survey reports and biological evaluations are not required if you are only requesting a PJD.

Minimum information required for processing:

Cover (Request) Letter (see attached sample with guidance):

1. Provide a short description of project area, identify people and date(s) of any site visits, and identify all other resources used.
2. Name, address, telephone number and e-mail address of landowner(s) requesting PJD. Copy of a recorded deed or tax record showing the landowner. If agent is used to request the PJD a signed statement from the landowner(s) must be included that clearly empowers the authorized agent to act on behalf of the landowner(s).
3. Cadastral location - Township, Range, and Section (e.g. T4N, R3E, Sec. 4, NE¼) and latitude and longitude in Degree Decimal format (i.e. 32.123456N and 110.123456W) of the project area midpoint. Please include datum, NAD 83 is preferred.
4. Letter from landowner(s) authorizing ACOE staff access the property for PJD purposes. Driving directions to the site and site access information for ACOE staff to make a site visit if necessary.

PJD form (see attached sample with guidance):

1. Fill out all fields in form. If more than 6 washes, request aquatic resources (AR) excel file. Some tips below when using AR excel form.
 - a. If copying use 'paste only values'.
 - b. Do not disable macros, use Orange shield to validate info.
 - c. Verify locations by exporting to csv and open in Google Earth.

2. Link -

<http://www.spl.usace.army.mil/Missions/Regulatory/JurisdictionalDetermination/WetlandDelineations.aspx>

JD Characteristics Table (See attached sample):

1. Wash name or for unnamed drainage features create alpha or alpha-numeric names such as Wash A, Wash B1, Wash B2, and Wash C etc.). May need to coordinate with Regulatory PM if a complex site.
2. Note what characteristics were used to make jurisdictional/non-jurisdictional recommendations (i.e. OHWM, scour, debris, change in vegetation, soil change, isolated, man-made, water source, and etc)
3. Wash width (feet), depth (feet), length (feet) and total wash area (acres) any existing drainage structure information.
4. Recommend as jurisdictional or non-jurisdictional each drainage feature in table.

Mapping (See attached sample with guidance):

1. Follow mapping standards, Final Map and Drawing Standards for the South Pacific Division Regulatory Program, August 6, 2012, http://www.spl.usace.army.mil/Portals/17/docs/regulatory/Permit_Process/SPD-RG_map-drawing-standards_final_20120806v3.pdf
2. Site Map – 8.5 x 11 portion of USGS map (1:24000 scale) with project/survey area outlined in black. Include quad name.
3. If more than one landowner please provide a landowner map. Does not need to be to scale.
4. Aerial photographs – within two years (preferred) and no smaller than 1" = 100'. Date of aerial and scale can be changed with prior approval from ACOE PM. Good resolution and full color in an 11x17 size or approved size by ACOE PM. The aerial must include:
 - a. Survey/Project area outlined in black, OHWM in red and waters of the United States in transparent yellow along with wash name and flow direction arrow.
 - b. Legend to include north arrow, scale, scale bar, date photograph taken, project name, preparer's name and date printed.
 - c. Optional – placing the Corps label (below)

Ground Level Photographs (see attached sample):

1. In color, and clearly capture the characteristics of that drainage to demonstrate whether its jurisdictional or non-jurisdictional.
2. Clearly key ground level photographs onto the aerial to indicate location and direction.
3. Provide photographs in one document clearly labeled. Note: each photograph should be around 500k or less in size but still retain quality on 8.5 x 11 document.
4. Provide sufficient photos to accurately represent the characteristics of any questionable site feature. If roads, swales, trails etc. are located on the site and appear to be drainages, label on the aerial photograph and provide sufficient photos to sufficiently document the nature of the feature. Please use a rod for scale in the photos and note the size of the rod.



Wetlands:



1. Mapping - Use a transparent green color to indicate wetland area, transparent blue for open water.
2. Provide a report (Use template) with data sheets which clearly demonstrate how the boundary was established in accordance with the Regional Supplement to the Corps Wetland Delineation: Arid West Region or Western Mountains, Valleys, and Coast Region.
<http://www.spl.usace.army.mil/Missions/Regulatory/JurisdictionalDetermination/WetlandDelineations.aspx>
3. If features are present on the site which may be interpreted from the aerial photo as wetlands but are not delineated provide sufficient information to clarify their status.

Please send only information which will assist in the evaluation of the PJD request. Concise and organized information is much easier to review. If your submittal lacks any of the requested information listed above, it may be returned to you for additional information.

Last updated: August 23, 2016

***** PRELIMINARY (RGL 08-02) *****
PRELIMINARY JURISDICTIONAL DETERMINATION
SECTION 404 CLEAN WATER ACT
U.S. Army Corps of Engineers, Los Angeles District
Application No. SPL-20XX-00XXX-KAT

 Boundary of area surveyed for potential jurisdictional waters of the United States
 Approximate Ordinary High Water Mark

 Potential Waters of the United States
 Potential Wetlands (If blank no wetlands occur with survey area.)

Scale: See scale bar Photograph Date:
Site Visit by Corps(Y/N): Date:
Determination Issued: MMDDYYYY Sheet x of x
Project Manager:

(Place letter on Landowner/agent letterhead)

Ms. Sallie Diebolt, Chief
Arizona Section Regulatory Branch
US Army Corps of Engineers
3636 North Central Avenue, Suite 900
Phoenix, AZ 85012

Attention: Regulatory PM

RE: Preliminary Jurisdictional Delineation
Project name and number
USACE File No.:

Dear Ms. Diebolt:

The Arizona Department of Transportation (ADOT) is planning to install concrete scour protection at the Eastbound (EB) Dead River bridge Structure No. 565 on Interstate 40 (I-40) from milepost (MP) 315.87 to MP 316.17 located approximately 30 miles northeast of Holbrook, Apache County, Arizona (Figures 1 and 2). The project occurs within and adjacent to an ADOT easement through undeveloped New Lands under the jurisdiction of the Navajo Nation. The cadastral location for the project area is SE ¼ of Section 32, Township 20N, Range 25E (Gila and Salt River Baseline and Meridian). The Dead River EB bridge crosses the Dead Wash at UTM 618010mE, 3883003mN, NAD 83, Zone 12N.

A ground survey to identify waters of the US in the project area was completed on October 25, 2007 by . The aerial photograph used during the ground survey was taken on an unknown date in 2005. Although the aerial photograph is more than 2 years old, it still accurately depicts waters of the US. Within the survey area, approximately 2.42 acres of the Dead Wash is proposed as waters of the US.

This letter serves as a request for review and issue of the preliminary jurisdictional delineation. Included for your review are the following items:

- State Location (Figure 1) and Project Vicinity (Figure 2) Maps
- Topographic and Floodplain Map (Figure 3)
- Drainage Area Map (Figure 4)
- Proposed Jurisdictional Delineation with Photo Points (Figure 5)
- Ground Photos
- JD Tables with Physical Characteristics and Other Information

If you have any questions or require additional information, please feel free to call me at 000.000.0000. Thank you for your assistance.

Sincerely,

Printed Name
Title
Company

Comment [11]: Will be assigned by Regulatory Project manager once package is received.

Comment [12]: Provide brief project description including: type of project (roadway, development, utility, maintenance), location such as highway, milepost, geographic reference point, Township, Range, Section, LAT/LONG NAD83, and USGS maps reference. See example below

Comment [13]: Do not need copies of previous Corps delineation letters just reference corps file number. Provide any other pertinent info that is not documented in any of the attached documents.

Comment [14]: Place consultant name, firm's name here.

Comment [15]: Provide a list of attachments, if necessary.

Comment [16]: Name, address, telephone number and e-mail address of landowner requesting PJD. Copy of a recorded deed or tax record showing the landowner. If agent is used to request the PJD a signed statement from the landowner must be included that clearly empowers the authorized agent to act on behalf of the landowner.

PRELIMINARY JURISDICTIONAL DETERMINATION FORM

This preliminary JD finds that the Corps will issue number and fill in the United States on the subject date the Corps will issue tifies all aquatic features on the site that could be affected by the proposed activity, based on the following information:

District Office Los Angeles District File/ORM # _____ PJD Date: _____

State AZ City/County _____
Nearest Waterbody: 1st downstream tributary that is named
Location: TRS, LatLong or UTM: TRS and lat/long in decimal degrees NAD 83
Name/ Address of Person Requesting PJD _____
Landowner or authorized agent _____

Identify (Estimate) Amount of Waters in the Review Area:
Non-Wetland Waters: _____ linear ft _____ width _____ acres _____ Stream Flow: _____
Wetlands: _____ acre(s) Cowardin Class: _____
Name of Any Water Bodies on the Site Identified as Section 10 Waters: Tidal: _____ Non-Tidal: _____
 Office (Desk) Determination
 Field Determination: _____ Date of Field Trip: _____

SUPPORTING DATA: Data reviewed for preliminary JD (check all that apply - checked items should be included in case file and, where checked and requested, appropriately reference sources below):
Corps will fill in

- Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant: _____
- Data sheets prepared/submitted by or on behalf of the applicant/consultant.
 - Office concurs with data sheets/delineation report.
 - Office does not concur with data sheets/delineation report.
- Data sheets prepared by the Corps
- Corps navigable waters' study: _____
- U.S. Geological Survey Hydrologic Atlas:
 - USGS NHD data.
 - USGS 8 and 12 digit HUC maps.
- U.S. Geological Survey map(s). Cite quad name: _____
- USDA Natural Resources Conservation Service Soil Survey. Citation: _____
- National wetlands inventory map(s). Cite name: _____
- State/Local wetland inventory map(s): _____
- FEMA/FIRM maps: _____
- 100-year Floodplain Elevation is: _____
- Photographs: Aerial (Name & Date): _____
 Other (Name & Date): _____
- Previous determination(s). File no. and date of response letter: _____
- Other information (please specify): _____

IMPORTANT NOTE: The information recorded on this form has not necessarily been verified by the Corps and should not be relied upon for later jurisdictional determinations.

Signature and Date of Regulatory Project Manager (REQUIRED) _____
Signature and Date of Person Requesting Preliminary JD (REQUIRED, unless obtaining the signature is impracticable) _____
sign and date prior to submitting

EXPLANATION OF PRELIMINARY AND APPROVED JURISDICTIONAL DETERMINATIONS:
1. The Corps of Engineers believes that there may be jurisdictional waters of the United States on the subject site, and the permit applicant or other affected party who requested this preliminary JD is hereby advised of his or her option to request and obtain an approved jurisdictional determination (JD) for that site. Nevertheless, the permit applicant or other person who requested this preliminary JD has declined to exercise the option to obtain an approved JD in this instance and at this time.
2. In any circumstance where a permit applicant obtains an individual permit, or a Nationwide General Permit (NWP) or other general permit verification requiring "preconstruction notification" (PCN), or requests verification for a non-reporting NWP or other general permit, and the permit applicant has not requested an approved JD for the activity, the permit applicant is hereby made aware of the following: (1) the permit applicant has elected to seek a permit authorization based on a preliminary JD, which does not make an official determination of jurisdictional waters; (2) that the applicant has the option to request an approved JD before accepting the terms and conditions of the permit authorization, and that basing a permit authorization on an approved JD could possibly result in less compensatory mitigation being required or different special conditions; (3) that the applicant has the right to request an individual permit rather than accepting the terms and conditions of the NWP or other general permit authorization; (4) that the applicant can accept a permit authorization and thereby agree to comply with all the terms and conditions of that permit, including whatever mitigation requirements the Corps has determined to be necessary; (5) that undertaking any activity in reliance upon the subject permit authorization without requesting an approved JD constitutes the applicant's acceptance of the use of the preliminary JD, but that either form of JD will be processed as soon as is practicable; (6) accepting a permit authorization (e.g., signing a proffered individual permit) or undertaking any activity in reliance on any form of Corps permit authorization based on a preliminary JD constitutes agreement that all wetlands and other water bodies on the site affected in any way by that activity are jurisdictional waters of the United States, and precludes any challenge to such jurisdiction in any administrative or judicial compliance or enforcement action, or in any administrative appeal or in any Federal court; and (7) whether the applicant elects to use either an approved JD or a preliminary JD, that JD will be processed as soon as is practicable. Further, an approved JD, a proffered individual permit (and all terms and conditions contained therein), or individual permit denial can be administratively appealed pursuant to 33 C.F.R. Part 331, and that in any administrative appeal, jurisdictional issues can be raised (see 33 C.F.R. 331.5(a)(2)). If, during that administrative appeal, it becomes necessary to make an official determination whether CWA jurisdiction exists over a site, or to provide an official delineation of jurisdictional waters on the site, the Corps will provide an approved JD to accomplish that result, as soon as is practicable.

PRELIMINARY JURISDICTIONAL DETERMINATION FORM

This preliminary JD finds that there *"may be"* waters of the United States on the subject project site, and identifies all aquatic features on the site that could be affected by the proposed activity, based on the following information:

Corps will issue and fill in

Sites

Corps will issue date

District Office Los Angeles District

File/ORM #

PJD Date:

State AZ

City/County

Person Requesting PJD

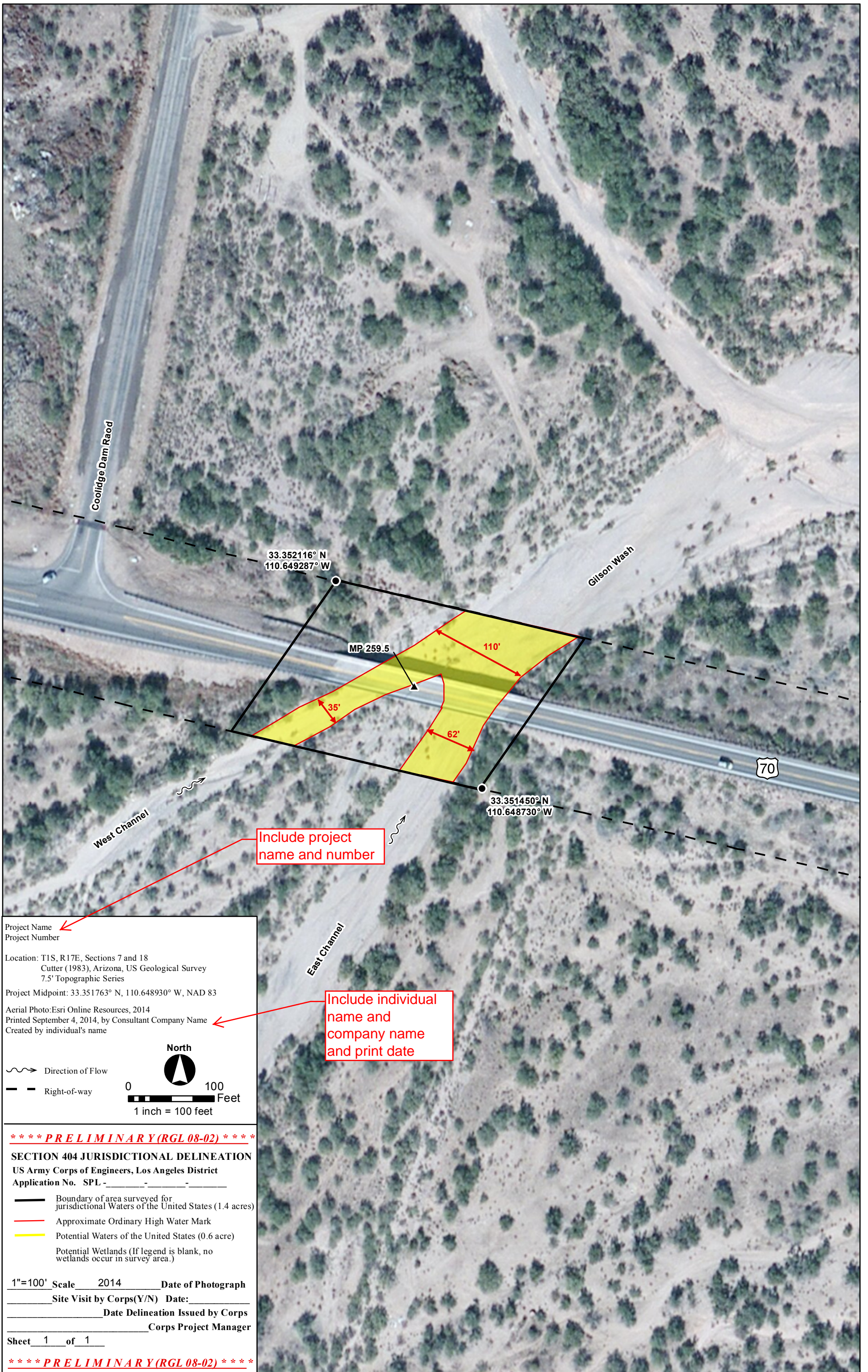
Site Number	Latitude	Longitude	Cowardin Class	Est. Amount of Aquatic Resource in Review Area	Class of Aquatic Resource

should correspond to other tables if appropriate

lat/long in decimal degrees NAD 83

Notes:

if more than 6 washes request Corps aquatic resources excel file to use.



Project Name
 Project Number

Location: T1S, R17E, Sections 7 and 18
 Cutter (1983), Arizona, US Geological Survey
 7.5' Topographic Series

Project Midpoint: 33.351763° N, 110.648930° W, NAD 83

Aerial Photo: Esri Online Resources, 2014
 Printed September 4, 2014, by Consultant Company Name
 Created by individual's name

North

Direction of Flow

Right-of-way

0 100 Feet
 1 inch = 100 feet

Include project name and number

Include individual name and company name and print date

*** PRELIMINARY (RGL 08-02) ***

SECTION 404 JURISDICTIONAL DELINEATION
 US Army Corps of Engineers, Los Angeles District
 Application No. SPL - - - - -

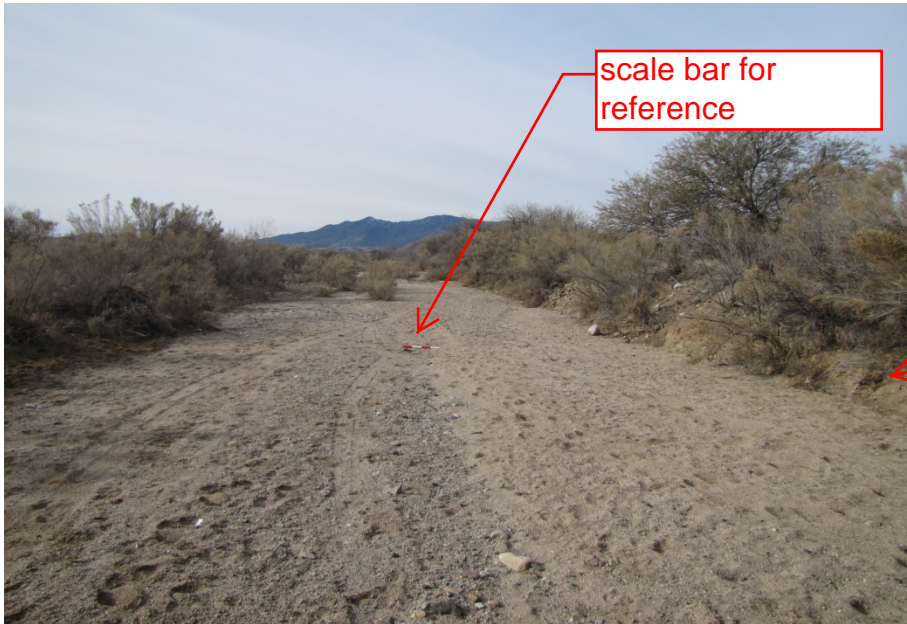
— Boundary of area surveyed for jurisdictional Waters of the United States (1.4 acres)
 — Approximate Ordinary High Water Mark
 — Potential Waters of the United States (0.6 acre)
 Potential Wetlands (If legend is blank, no wetlands occur in survey area.)

1"=100' Scale 2014 Date of Photograph
 Site Visit by Corps(Y/N) Date:
 Date Delineation Issued by Corps
 Corps Project Manager

Sheet 1 of 1

*** PRELIMINARY (RGL 08-02) ***

Photos were taken January 11, 2012. The scale bar is 2 feet long with 6-inch segments.



Gilson Wash, Photo 1. View upstream from the west channel wash bed, facing southwest.



Gilson Wash, Photo 2. View downstream toward Gilson Wash Bridge from the west channel wash bed, facing northeast.



Gilson Wash, Photo 3. View upstream of the high-flow area between the east and west channels, facing southwest.



Gilson Wash, Photo 4. View downstream toward Gilson Wash Bridge from the high-flow area between the east and west channels, facing northeast.

Photos were taken January 11, 2012. The scale bar is 2 feet long with 6-inch segments.



Gilson Wash, Photo 5. View upstream from the east channel wash bed, facing southwest.



Gilson Wash, Photo 6. View downstream toward Gilson Wash Bridge from the east channel wash bed, facing northeast.



Gilson Wash, Photo 7. View downstream from the wash bed, facing northeast.



Gilson Wash, Photo 8. View upstream toward Gilson Wash Bridge from the wash bed, facing southwest.

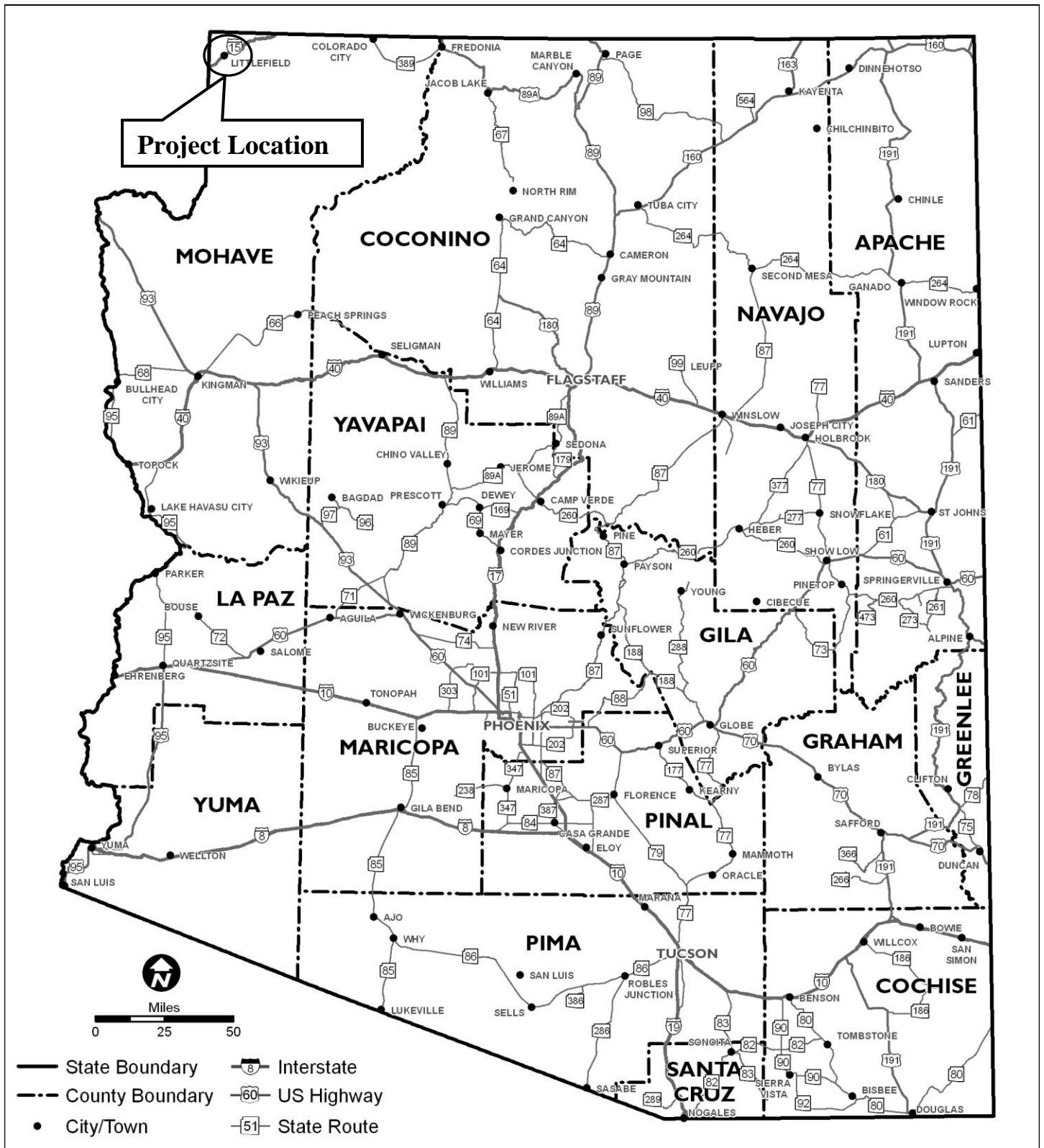


Figure 1. State Location Map

Project Name
 Project Number

Include Project Name and Project Number (if applicable) Typical for all graphics

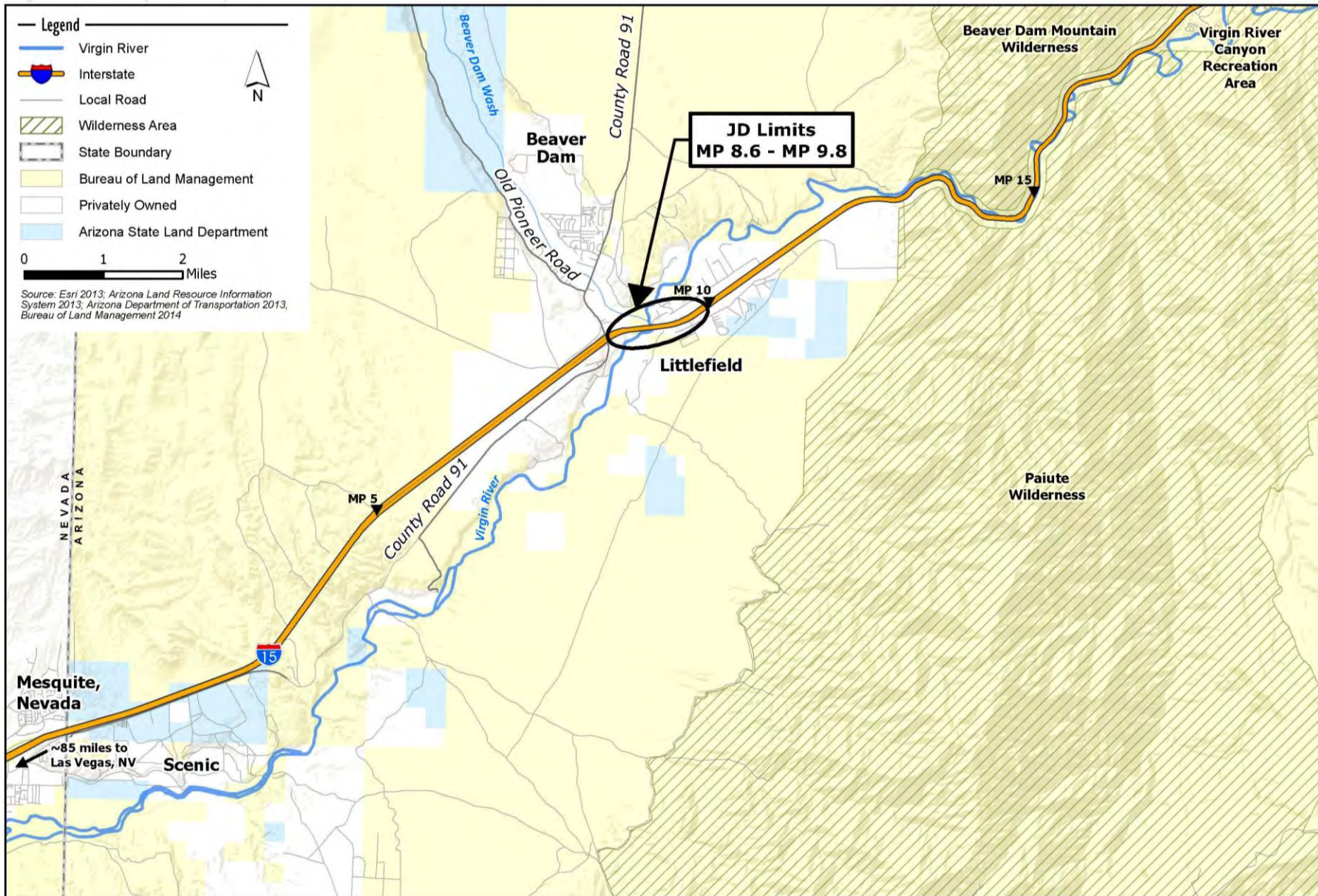


Figure 2. Vicinity Map

Project Name

Project Number

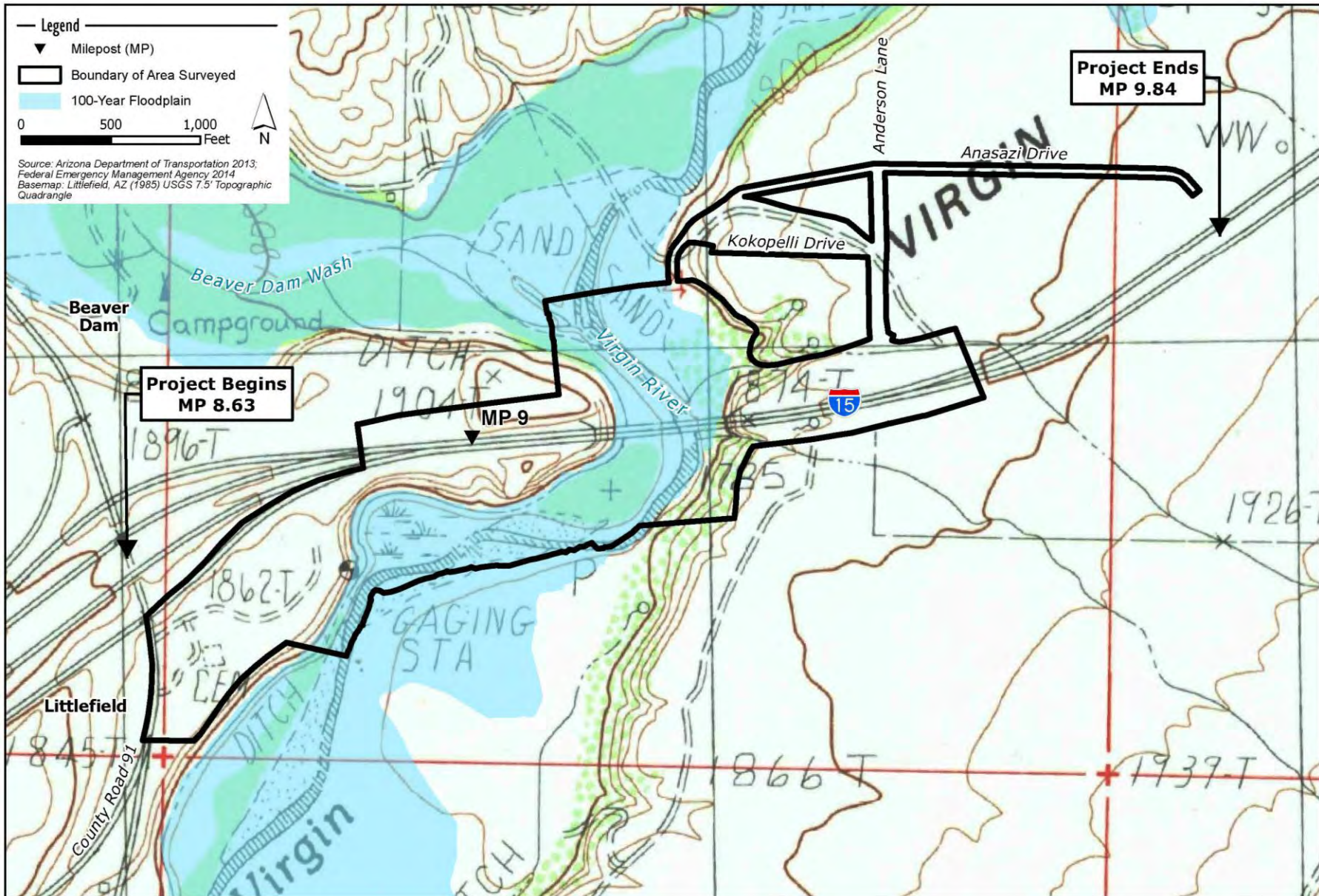


Figure 3. Jurisdictional Delineation Survey Areas, Topographic, and Floodplain Map

Project Name

Project Number



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

NOV 15 2016

Mr. Matthew Bilsbarrow, NEPA Document Manger
Western Area Power Administration
P.O. Box 6457
Phoenix, AZ 85005

Subject: Notice of Intent to Prepare an Environmental Assessment for Construction
of a Communications Facility on Crossman Peak in Mohave County, Arizona

Dear Mr. Bilsbarrow:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

To assist in the scoping process for this project, we have identified several issues for your attention in the preparation of the Draft Environmental Assessment. These issues include: impacts to air, water, biological resources, and habitat, among others.

We appreciate the opportunity to review this scoping notice and are available to discuss our comments. Please send one hard copy of the Draft EA and one CD-ROM copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3742 or kelly.patrickj@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Tom Bilsbarrow".

Patrick Kelly
Environmental Review Section

Enclosure: EPA's Detailed Comments

U.S. EPA DETAILED COMMENTS ON THE NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL ASSESSMENT FOR CONSTRUCTION OF A COMMUNICATIONS FACILITY ON CROSSMAN PEAK IN MOHAVE COUNTY, ARIZONA, NOVEMBER 15, 2016

Purpose and Need

The Draft Environmental Assessment should clearly identify the underlying purpose and need to which the Western Area Power Administration is responding in proposing the alternatives (40 CFR 1502.13). The *purpose* of the proposed action is typically the specific objectives of the activity, while the *need* for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity. When formulating the need, identify and describe the underlying problem, deficiency, or opportunity that the action is meant to address. The purpose then defines the measurable objectives to be used for evaluating the effectiveness of potential alternatives toward meeting the need.

Alternatives Analysis

The National Environmental Policy Act requires evaluation of reasonable alternatives. Reasonable alternatives should include, but are not necessarily limited to, alternative locations within the project area, alternatives that identify environmentally sensitive areas or areas with potential use conflicts, alternative technologies, and alternative configurations of key components. The Draft EA should provide a discussion of the reasons for the elimination of alternatives which are not evaluated in detail.

A reasonable range of alternatives will include options for avoiding environmental impacts. The alternatives analysis should describe the approach used to identify environmentally sensitive areas and describe the process that was used to designate them in terms of sensitivity (e.g. low, medium, and high). The Council on Environmental Quality Regulations for Implementing NEPA state that alternatives should include appropriate mitigation measures not already included in the proposed action or alternatives (40 CFR 1502.14(f)).

Site Characterization Surveys and Site Assessment Activities

The Draft EA should provide detailed descriptions of the proposed site characterization surveys and site assessment activities that will be conducted over the next five years and also discuss alternative methods of characterizing or assessing the site(s). The Draft EA should describe the type of data that will be collected and identify the area over which effects may occur in order to better inform baseline data collection.

Description of Technology to be Deployed

The Draft EA should provide a clear description of the microwave communication equipment most likely to be deployed. Understanding the technical aspects of the proposed project is critical in determining what types of characterization surveys and site assessment activities are needed.

Water Resources

The Draft EA should include detailed information on the functions and locations of ephemeral washes in the project area. Natural ephemeral washes perform a diverse range hydrologic and biogeochemical functions that directly affect the integrity and functional condition of higher order waters downstream. Healthy ephemeral waters with characteristic plant communities control rates of sediment deposition and dissipate the energy associated with flood flows. The Draft EA should fully describe measures to avoid increased runoff, erosion, and sedimentation near ephemeral washes and other water resources for all alternatives evaluated.

Air Quality

The Draft EA should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards, nonattainment areas, general conformity requirements and potential air quality impacts of the project, including cumulative and indirect impacts, for each fully evaluated alternative. The Draft EA should also identify mitigation measures to reduce direct, indirect and cumulative air quality impacts.

Biological Resources and Habitat

Species and Habitat Protection

The Draft EA should identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area. In particular, please consider the impacts of construction and maintenance of the new power distribution line and access road on biological resources. The Draft EA should describe site characterization and assessment activities that will be conducted in the project area to identify threatened and endangered species and critical habitat. Emphasis should be placed on the protection and recovery of species due to their status or potential status under the federal or state Endangered Species Act legislation. Analyses of impacts should include:

- Identification of the area over which biological effects may occur.
- A description of the condition of existing roads, and the length and location of each road segment that needs to be constructed or improved.
- Baseline conditions of habitats and populations of covered species. Developing sufficient description of some species may require multiple years of monitoring.
- A description of the impacts of the proposed communication site and associated roads and power distribution lines on habitat connectivity in the project area.
- Monitoring, reporting, and adaptive management efforts, to ensure species and habitat conservation effectiveness.
- A clear description of how avoidance, mitigation and conservation measures will protect and encourage the recovery of the covered species and their habitats in the project area, particularly with respect to the powerlines.
- Identification of critical reproductive seasons and habitat for affected species.

Electromagnetic Fields

The Draft EA should discuss whether microwave radiation from the communication facility, or cables transmitting electricity to the facility, will emit electromagnetic fields, and if this could affect the movements and navigation of species that are sensitive to electric or magnetic fields.

Cumulative Impacts

Cumulative impact analyses describe the threat to resources as a whole, presented from the perspective of the resource, instead of from the individual project. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR §1508.7).

Discussions of cumulative impacts are usually more effective when included in the larger discussions of environmental impacts from the action, as opposed to locating cumulative impact analyses in a separate chapter.

The Draft EA should describe the methodology used to assess cumulative impacts. We recommend the methodology developed jointly by EPA, the Federal Highway Administration, and the California Department of Transportation, available at:

http://www.dot.ca.gov/ser/cumulative_guidance/approach.htm. While this methodology was developed

for transportation projects, the principles and steps in this guidance offer a systematic way to analyze cumulative impacts for any project.

Climate Change Effects

Consistent with the CEQ guidance,¹ we recommend that the EA describe potential changes to the affected environment that may result from climate change. Including future climate scenarios, such as those provided by the U.S. Global Change Research Program's National Climate Assessment,² in the EA that provide information valuable to determine whether the proposal includes appropriate resilience and preparedness measures for the impacts of climate change.

The EPA recommends that the proposal's design incorporate measures to improve resiliency to climate change, where appropriate. These changes could be informed by the future climate scenarios addressed in the "Affected Environment" section. The EA's alternatives analysis should, as appropriate, consider practicable changes to the proposal to make it more resilient to anticipated climate change. Changing climate conditions can affect a proposed project, as well as the project's ability to meet the purpose and need presented in the EA.

Hazardous Materials/Waste Management

The Draft EA should address potential direct, indirect and cumulative impacts of waste generation, including hazardous waste, from construction and operation. The document should identify projected waste types and volumes, including from maintenance vehicles, and identify expected storage, disposal, and management. Identify the applicability of federal hazardous waste requirements. The generation of hazardous waste should be minimized.

Non-Routine Events

The Draft EA should discuss the potential impacts of non-routine events such as severe storms, vehicle collisions, and spills.

¹ CEQ Guidance, p. 20

² <http://nca2014.globalchange.gov/>

Appendix F

Air Quality Emissions Calculations and Supporting Information

Appendix F

Air Quality Emissions Calculations and Supporting Information

Table F-1. PM10 and PM2.5 Emissions from Construction, Overall – Proposed Action

Construction	Duration	Area (square feet)	Count	Total Area (square feet)	Total Area (acres)	Project Total Area (acres)
Communications Facility	Permanent	3500	1	3500	0.0803488	
Distribution Pole	Temporary and Permanent	2500	250	625000	14.348	16.95
Conductor Stringing	Temporary	5000	22	110000	2.525248	
Project Total Area (acres)	Construction Duration (months)	Acre-months	PM10 Factor (ton/acre-month)	PM2.5/PM10 Factor	PM10 (ton)	PM2.5 (ton)
16.95	7	118.68	0.11	0.15	13.1	2.0

Ref: MRI 1996. Improvement of Specific Emission Factors (BACM Project No.1)

Cited by: Western Regional Air Partnership (WRAP) 2006. Fugitive Dust Handbook. (Table 3-2, PM10 emission factors; minimal earthmoving, average conditions)

0.15: PM2.5 portion of airborne PM10 (EPA AP-42 Sec 13.2.5)

Table F-2. AQ-GHG Emissions from Construction, Overall - Proposed Action

	Emission Rates								
	NOx (ton)	HCs (ton)	PM10 (ton)	PM2.5 (ton)	CO (ton)	SOx (ton)	CO2 (MT)	CH4 (MT)	N2O (MT)
Disturbed Area Subtotal	---	---	13.05	1.96	---	---	---	---	---
Non-Road Subtotal	15.29	0.75	0.66	0.64	2.74	0.26	950.16	3.51	2.79
Portable Subtotal	0.41	0.25	0.01	0.01	15.34	0.00	127.70	0.48	0.38
Helicopters Subtotal	0.21	0.16	0.01	0.01	0.20	---	27.22	0.02	0.26
Total	15.91	1.16	13.73	2.62	18.27	0.26	1112.52	---	---

Note: Emissions from on-highway vehicles are not included

Table F-3. AQ-GHG Emissions from Construction Equipment – Proposed Action, 15 Pieces Per Typical Day

Non-Road (Diesel) Mobile Sources								Emission Factors								
Count (# units)	Power (HP)	EPA NR-009d (HP Class)	BSFC (lb/hp-hr)	Profile (% Load)	Diesel Use per # (lb/hr)	Diesel Use per # (gal/hr)	NOx (g/hp-hr)	HCs (g/hp-hr)	PM10 (g/hp-hr)	PM2.5 (g/hp-hr)	CO (g/hp-hr)	SOx (g/hp-hr)	CO2 (kg/gal)	CH4 (kg/gal)	N2O (kg/gal)	
Misc. small tools	1	30	25 - 50	0.408	0.74	9.1	1.3	4.7279	0.2789	0.3389	0.3287	1.5323	0.1084	10.15	0.0015	0.0001
Compressor or other tools	1	75	75 - 100	0.408	0.74	22.6	3.2	5.5988	0.5213	0.4730	0.4588	2.3655	0.1082	10.15	0.0015	0.0001
Lifts; Excavators	4	150	100 - 175	0.367	0.74	40.7	5.8	5.6523	0.3384	0.2799	0.2715	0.8667	0.0974	10.15	0.0015	0.0001
Loaders; Backhoes; Graders	4	250	175 - 300	0.367	0.74	67.9	9.6	5.5772	0.3085	0.2521	0.2445	0.7475	0.0975	10.15	0.0015	0.0001
Crane; Drill Rig	3	315	300 - 600	0.367	0.74	85.5	12.2	6.0153	0.2025	0.2008	0.1948	1.3060	0.0975	10.15	0.0015	0.0001

Non-Road (Diesel) Mobile Sources		Emission Rates								
	Fuel Use (gal/hr)	NOx (lb/hr)	HCs (lb/hr)	PM10 (lb/hr)	PM2.5 (lb/hr)	CO (lb/hr)	SOx (lb/hr)	CO2 (lb/hr)	CH4 (lb/hr)	N2O (lb/hr)
Misc small tools	0.95	0.23	0.01	0.02	0.02	0.07	0.01	21.3	0.003	0.0002
Compressor or other tools	2.38	0.69	0.06	0.06	0.06	0.29	0.01	53.3	0.008	0.0005
Lifts; Excavators	17.13	5.53	0.33	0.27	0.27	0.85	0.10	383.3	0.057	0.0038
Loaders; Backhoes; Graders	28.55	9.10	0.50	0.41	0.40	1.22	0.16	638.8	0.094	0.0063
Crane; Drill Rig	26.98	9.27	0.31	0.31	0.30	2.01	0.15	603.6	0.089	0.0059
In Service (hr per #)		NOx (ton)	HCs (ton)	PM10 (ton)	PM2.5 (ton)	CO (ton)	SOx (ton)	CO2 (MT)	CH4 (MT)	N2O (MT)
Non-Road Subtotal	1232	15.3	0.8	0.7	0.6	2.7	0.3	950.2	0.1404	0.0094

Note: Overall Use/Activity: 154 days, 8 hr/day

Table F-3. AQ-GHG Emissions from Construction Equipment – Proposed Action, 15 Pieces Per Typical Day, Continued

Non-Road (Gasoline) Portable Sources (generators, welders, landscaping)								Emission Factors								
Count (# units)	Power (HP)	EPA NR-010f (HP Class)	BSFC (lb/hp-hr)	Profile (% Load)	Diesel Use per # (lb/hr)	Diesel Use per # (gal/hr)	NOx (g/hp-hr)	HCs (g/hp-hr)	PM10 (g/hp-hr)	PM2.5 (g/hp-hr)	CO (g/hp-hr)	SOx (g/hp-hr)	CO2 (kg/gal)	CH4 (kg/gal)	N2O (kg/gal)	
Non-handheld (under 25hp, gasoline)	4	6	Class II, SV	0.868	0.74	3.85	0.63	4.5	5.5	0.06	0.0582	387.02	0.011	8.81	0.0014	0.0001
Misc. Portable (over 25hp, gasoline)	4	50	Ph 1, 4-stroke	0.484	0.74	17.91	2.91	1.51	0.59	0.06	0.0582	29.86	0.006	10.15	0.0015	0.0001

Non-Road (Gasoline) Portable Sources (generators, welders, landscaping)										
Fuel Use (gal/hr)	Emission Rates									
	NOx (lb/hr)	HCs (lb/hr)	PM10 (lb/hr)	PM2.5 (lb/hr)	CO (lb/hr)	SOx (lb/hr)	CO2 (lb/hr)	CH4 (lb/hr)	N2O (lb/hr)	
Non-handheld (under 25hp, gasoline)	1.85	0.18	0.22	0.002	0.002	15.15	0.0004	36.0	0.006	0.0004
Misc. Portable (over 25hp, gasoline)	8.61	0.49	0.19	0.020	0.019	9.74	0.0021	192.6	0.028	0.0019
In Service (hr per #)	NOx (ton)	HCs (ton)	PM10 (ton)	PM2.5 (ton)	CO (ton)	SOx (ton)	CO2 (MT)	CH4 (MT)	N2O (MT)	
Portable Subtotal	1232	0.41	0.25	0.014	0.013	15.34	0.0016	127.7	0.019	0.0013

Note: Overall Use/Activity: 154 days, 8 hr/day

Diesel Emission Factors:

Ref: USEPA, Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling --Compression-Ignition, NR-009d. (EPA-420-R-10-018, July 2010).

NR-009d: Table A4, Steady-State Emission Factors; BSFC = in-use adjusted fuel consumption.

GHG: CCAR General Reporting Protocol, Carbon Dioxide Emission Factors for Transport Fuels (Distillate/Diesel) 1/2009.

Diesel Fuel Density: (2.205 lb/kg) * 1000 kg / [7.46 barrel * 42 gal/barrel] = 7.04 lb/gal.

Basis: average HP and load factor from OFFROAD model; historic sulfur fuel content up to 300 ppm (mandatory 15 ppm).

Assumption: contractor diesel engines are Tier 1 or better (model year 1996 or newer).

Gasoline Emission Factors:

Ref: USEPA, Exhaust Emission Factors for Nonroad Engine Modeling --Spark-Ignition, NR-010f. (EPA-420-R-10-019, July 2010).

NR-010f: Table 5, Emissions and BSFCs for Class II Non-handheld Small SI Engines & Table 6; BSFC = in-use adjusted fuel consumption.

Spark-Ignition Engines <25 HP, Non-handheld, Class II, Phase 1 (1997 or newer).

GHG: CCAR General Reporting Protocol, Carbon Dioxide Emission Factors for Transport Fuels (Motor Gasoline) 1/2009.

Motor Gasoline Fuel Density: (2.205 lb/kg) * 1000 kg / [8.53 barrel * 42 gal/barrel] = 6.16 lb/gal.

Table F-4. AQ-GHG Emissions from Construction Helicopter Activity

Helicopter Type	Count (# units)	Power (HP)	EPA NR-010f (HP Class)	BSFC (lb/hp-hr)	Profile (% Load)	Diesel Use per # (lb/hr)	Diesel Use per # (gal/hr)	Emission Factors								
								NOx (g/hp-hr)	HCs (g/hp-hr)	PM10 (g/hp-hr)	PM2.5 (g/hp-hr)	CO (g/hp-hr)	SOx (g/hp-hr)	CO2 (kg/gal)	CH4 (kg/gal)	N2O (kg/gal)
Hughes/MD500 (SHP < 600)	1	420	0.8	336	0.031	1.12E+02	11.7	5.74	7.13	0.18	0.18	8.88	---	9.57	0.0003	0.00031
Bell 222 two-engine (600 < SHP < 1000)	1	715	0.8	572	0.044	1.599E+0	16.7	7.77	4.02	0.23	0.23	4.92	---	9.57	0.0003	0.00031

Helicopter Type	Fuel Use (gal/hr)	Emission Rates								
		NOx (lb/hr)	HCs (lb/hr)	PM10 (lb/hr)	PM2.5 (lb/hr)	CO (lb/hr)	SOx (lb/hr)	CO2 (lb/hr)	CH4 (lb/hr)	N2O (lb/hr)
Hughes/MD500 (SHP < 600)	11.7	1.42	1.77	0.04	0.04	2.20	---	247.50	0.01	0.01
Bell 222 two-engine (600 < SHP < 1000)	16.7	2.74	1.42	0.08	0.08	1.74	---	352.57	0.01	0.01
	In Service (hr per #)	NOx (ton)	HCs (ton)	PM10 (ton)	PM2.5 (ton)	CO (ton)	SOx (ton)	CO2 (MT)	CH4 (MT)	N2O (MT)
Helicopter Subtotal	100	0.21	0.16	0.006	0.006	0.20	---	27.219	0.0008	0.0009

Note: Overall Use/Activity: 10 days, 10 hr/day

Helicopter Emission Factors:

Ref: Swiss Confederation, DETEC and FOCA "Guidance on the Determination of Helicopter Emissions", 2015.

GHG Factors: <http://www.eia.gov/oiaf/1605/coefficients.html>.

Jet Fuel: 21.1 lb/gal.


Appendix G

Visual Contrast Rating Sheets

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
VISUAL CONTRAST RATING WORKSHEET

Date: _____
 District/ Field Office: Lake Havasu FO
 Resource Area: _____
 Activity (program): _____

SECTION A. PROJECT INFORMATION

1. Project Name: Crossman Peak Communications Facility Project	4. Location Township _____	5. Location Sketch 
2. Key Observation Point: KOP 1 -- 34°34'26.08"N, 114°11'14.95"W	Range _____	
3. VRM Class: Class II	Section _____	

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Irregular, incised topography	Patchy	Distant towers visible
LINE	Irregular	Irregular and patchy	Vertical cultural elements in distance
COLOR	Tan to brown with blue hues in distance	Muted grey-green, green, tan	Indistinct coloration
TEX-TURE	Granular	Mottled on land	Visible as vertical lines against sky

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Same	Same	Spaced vertical elements (poles) in foreground with horizontal elements (wires) connecting them
LINE	Same	Same	Spaced vertical elements in foreground with horizontal elements connecting them
COLOR	Same	Same	Brown to brown-grey
TEX-TURE	Same	Same	Smooth continuous texture in individual vertical elements

SECTION D. CONTRAST RATING SHORT TERM LONG TERM

1.	DEGREE OF CONTRAST	FEATURES												2. Does project design meet visual resource management objectives? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Explain on reverses side) 3. Additional mitigating measures recommended ___ Yes <input checked="" type="checkbox"/> No (Explain on reverses side)
		LAND/WATER BODY (1)				VEGETATION (2)				STRUCTURES (3)				
		STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	
		FORM		X				X			X			
LINE			X				X		X					
COLOR			X				X			X				
TEXTURE			X				X		X					
ELEMENTS												Evaluator's Names Fritts Golden Date 1/9/2017		

SECTION D. (Continued)

Comments from item 2.

D.2: Low level of change from existing conditions. Visible only in foreground. Infrequent visitors to end of trail. Consistent with VRM Class II criteria

Additional Mitigating Measures (See item 3)

D.3: Measures incorporated in Proposed Action reduce potential reflectance of steel. Steel and wood poles will weather. No additional mitigation required.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
VISUAL CONTRAST RATING WORKSHEET


Date: January 9, 2017

District/ Field Office: Lake Havasu FO

Resource Area:

Activity (program):

SECTION A. PROJECT INFORMATION

1. Project Name: Crossman Peak Communications Facility Project	4. Location Township _____	5. Location Sketch 
2. Key Observation Point: KOP 2 -- 34°33'07.22"N, 114°11'35.96"W	Range _____	
3. VRM Class: Class II	Section _____	

SECTION B. CHARACTERISTIC LANDSCAPE DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Angular forms in foreground and middle ground, flat background, angular beyond background at distance	Patchy to not visible at distance	None visible
LINE	Irregular	Irregular and patchy	None visible
COLOR	Tan with blue hues at distance	Tan to muted green	None visible
TEXTURE	Smooth to granular	Mottled	None Visible

SECTION C. PROPOSED ACTIVITY DESCRIPTION

	1. LAND/WATER	2. VEGETATION	3. STRUCTURES
FORM	Same	Same	Spaced vertical elements in association with existing unpaved road/trail
LINE	Same	Same	Increased vertical elements (poles) and horizontal elements (lines) in foreground
COLOR	Same	Same	Brown to grey spaced vertical elements (poles)
TEXTURE	Same	Same	Sparse

SECTION D. CONTRAST RATING SHORT TERM LONG TERM

1.	DEGREE OF CONTRAST	FEATURES												2. Does project design meet visual resource management objectives? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Explain on reverse side) 3. Additional mitigating measures recommended ___ Yes <input checked="" type="checkbox"/> No (Explain on reverses side)
		LAND/WATER BODY (1)				VEGETATION (2)				STRUCTURES (3)				
		STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	STRONG	MODERATE	WEAK	NONE	
		FORM		X				X				X		
		LINE			X				X			X		
ELEMENTS	COLOR			X			X			X				
	TEXTURE			X			X			X				
											Evaluator's Names Fritts Golden	Date 1/9/2017		

SECTION D. (Continued)

Comments from item 2.

D.2: Low level of change from existing conditions. Visible only in foreground. Consistent with VRM Class II criteria.

Additional Mitigating Measures (See item 3)

D.3: Measures incorporated in Proposed Action will reduce potential reflectance of steel, no additional mitigation required.
