

**DECISION NOTICE  
AND  
FINDING OF NO SIGNIFICANT IMPACT (FONSI)  
WIRELESS COMMUNICATIONS SITE  
AT  
ARIZONA SNOWBOWL**

**BACKGROUND, DECISION AND RATIONALE**

**Background** - In recent years the demand for wireless communication services has expanded tremendously. There are seven different carriers of wireless telephone services licensed by the Federal Communications Commission (FCC) for Northern Arizona. The licensed carriers include cellular (analog), PCS (digital), and enhanced specialized mobile radio service (ESMR) wireless services. A condition of the carrier's FCC license mandates that they provide full coverage of the licensed areas by a certain date. In order to provide this coverage, new communication sites on National Forest land must be developed. The President of the United States and Congress have made it clear to federal agencies that implementation of a wireless communication system is important and should be facilitated. On August 10, 1995, President Clinton signed an Executive Memorandum to federal agencies that stated "Upon request, and to the extent possible by law and where practical, executive departments and agencies shall make available Federal Government buildings and lands for the siting of mobile service antennas. On February 8, 1996, Congress followed by passing the Telecommunications Act of 1996 which gave further direction to federal agencies to help facilitate implementation of wireless communication services.

In February of 1997, CellularOne submitted a proposal for a wireless communication facility within the permit area for the Arizona Snowbowl. The Arizona Snowbowl permit area was preferred as a site because it is a developed downhill ski area with good existing access and electrical power. In addition, the location and high elevation of the Snowbowl site potentially offers good signal coverage for a larger area. The Arizona Snowbowl is authorized under a special use permit from the USDA Forest Service, and is located 14 miles outside of the community of Flagstaff. The permit area is situated on the western flanks of the San Francisco Mountain (the Mountain), the highest peaks in northern Arizona. Two heavily used U.S. Highways border the Mountain on the east and west, one leading to the Grand Canyon, and the other to the popular recreational destination of Lake Powell. The proposed tower site is located within the Arizona Snowbowl maintenance yard at NW1/4 SE1/4, Section 36, Township 23 North, Range 6 East, (G&SRBM).

The National Environmental Policy Act (NEPA) process for this project took much longer than anticipated. The delays were a result of many factors. First, proposal development and the NEPA process resulted in relocation of the initially proposed site to meet American Indian concerns, and mitigate other environmental effects. Second, coordination and negotiation with the Snowbowl as the primary permit holder became protracted. Although the Forest Service controls the land and the Snowbowl special use permit, prior existing uses on National Forest

land such as the ski area permit are protected from interference by new uses and their approval must be coordinated with the existing permit holder. The initial negotiations became extended and lengthy because other unrelated issues required resolution in order to proceed. The third factor that delayed the process was the time it took to complete the thirteen American Indian group consultations, their outcome, and concurrence by the Arizona State Historic Preservation Office. Once it became apparent that these issues were in resolution, negotiations with Snowbowl became serious and the project was determined to be acceptable by Snowbowl management. This acceptance triggered the Forest's decision. Though two years is longer than a NEPA analysis of this type should take, there have been no rule changes that would affect the legitimacy of the process.

**Decision** - It is my decision to authorize a new low power communication site to be built within the Arizona Snowbowl ski area permit and to amend the Coconino National Forest Land Management Plan to designate a new communication site. The Forest Land Management Plan designation and site plan will limit development of the site to one equipment building and one freestanding tower. The location of the new communication site is within the existing developed area defined as the Snowbowl maintenance yard. My decision is based on careful consideration of the area's existing resource conditions, current permitted uses, public concerns, and the environmental effects of implementing the various alternatives.

**Selected Alternative** - Below is a synopsis of the Preferred Alternative. Additional detail is located in the Environmental Assessment and the project record. Implementation of this alternative will:

- Comply with the Telecommunications Act of 1996, and the August 10, 1995, Memorandum from the President of the United States, which states that we shall make available Federal Government buildings and lands for mobile service antennas.
- **Amend the Coconino National Forest Land Management Plan by designating a new communication site that is a critical component of the overall strategy of the wireless telephone industry for providing service to northern Arizona.** New telecommunication sites located on public lands require an amendment to the Land Management Plan. This proposal will designate a new low power communication site (1000 watts ERP maximum) at the Arizona Snowbowl maintenance yard. This proposal is consistent with the wireless telephone industry master plan for Coconino National Forest.
- Authorize construction of a free standing tower and equipment building at the 9,500-foot elevation in a previously disturbed and developed location. The Forest Land Management Plan Amendment and site designation will limit development of the site to one tower and one equipment building as specified by the approved site plan.
- Improve communication coverage along U.S. Highway 180, for emergency services as well as the traveling public.
- Improve communications to isolated residences in the Hart Prairie, Kendrick Park, and Indian Flats areas.

**Mitigation** – The following is required to mitigate visual concerns:

- Initial tower construction is limited to 125 feet in height. The Forest Service will consider extending the tower and antennae to a maximum height of 150 feet, at such time as the communication site leaseholder can provide evidence that more tower space is needed for collocation of additional tenants, and that extending the tower to 150 feet is visually acceptable. The leaseholder must show that new uses cannot be accommodated through combining antennae or other technology.
- A common microwave system for site users is required to minimize the number of microwave dishes. The Forest Service must approve the size and structure of microwave dishes before installation to ensure they meet visual quality objectives.
- The tower must be painted flat black. The tower must be painted prior to construction and must be inspected and approved by the Forest Service.
- All antennae, microwave dishes, and antennae support structures must be painted flat black before installation on the tower.

**Rationale** – Local emergency service providers, residents of the Hart Prairie, Kendrick Park, and Indian Flats area, and more recently, wireless communications users, have asked that the Forest Service help facilitate enhancement of communications north and west of the San Francisco Mountain. Most of the previous proposals have involved installing multiple antennas on existing buildings belonging to the Arizona Snowbowl Ski Resort, or locating multiple towers on National Forest lands. In 1996 and again in 2000, our own experience on large wildfires located on the north half of the forest, confirmed the lack of reliable communications during times of critical need.

Another important objective in developing this proposal was to avoid proliferation of communication towers on both National Forest System lands and elsewhere. Upgrades in technology over the past decade have made it possible to provide wireless communications services through co-location of multiple users within the same equipment building and tower. The elevation of the Snowbowl site provides better coverage for the wireless communications system with fewer towers.

Alternatives initially considered but dropped, included other locations and other tower designs at the preferred alternative site. Placement of a tree-simulated monopole tower at the Snowbowl site was considered. It was determined that the tree-simulated alternative would actually have more visual impact because of the immense pole size required to support the number of antennae arrays needed for co-location and the extra strength needed because of ice and snow loading that will be encountered at this high elevation. It also had the potential to lead to tower proliferation because of limited space on the pole. Lower elevation alternatives were dropped from consideration because in order to provide the same service that the Snowbowl site will provide, multiple new communication sites with excessive tower heights would need to be constructed. Lower elevation alternatives would have greater visual and environmental effects, whether located on Forest land or elsewhere.

In response to the explosive growth of wireless communications needs, the Forest Service asked the industry to collaboratively develop a comprehensive plan for Northern Arizona that would identify additional communication sites that will be needed on National Forest System lands to meet industry commitments for the next five to ten years. The plan was developed as part of an on-going and separate NEPA process for siting new communication sites on National Forest Land in northern Arizona. This plan is based on the technical requirements of the carriers and Forest Service environmental constraints that included 200-foot maximum tower heights and designs that would accommodate co-location of all licensed carriers. The Snowbowl site and Saddle Mountain, a designated site north of the Snowbowl, were identified as key components of the system to provide coverage for the Highway 180 area.

Other site location alternatives included placement of towers on Kendrick Mountain, a designated wilderness area, and Wing or Saddle Mountain. In each case, extensive construction would be required to provide power and access to the sites, and had far greater potential for environmental impacts. In addition, it was identified through the wireless industry study that development of the Saddle Mountain site would not eliminate the need for the Snowbowl site.

I also considered the “No-Action” alternative. This alternative did not meet my objective of improving essential communications for northern Arizona, and did not comply with the mandates of the Telecommunications Act of 1996.

Consideration of all the alternatives led me to select the Preferred Alternative, which best meets both objectives of enhanced communication without proliferation of towers, and compliance with the Telecommunications Act. In addition, because the preferred alternative site has existing access and utilities, there will be no need for new roads and power lines.

Of all of the alternatives, the Preferred Alternative has less environmental effect because the tower and equipment building will be placed at a previously disturbed location. The management and owner of the Snowbowl have agreed to the location and development limits of the Preferred Alternative. Archaeological surveys found no sites. The Biological Assessment and Evaluation determined no direct, indirect, or cumulative effects to Threatened, Endangered and Sensitive species, since the tower is to be placed within the permitted ski area. Consultation, including site visits with regional Indian Tribes was accomplished, which determined that the proposal was acceptable as long as development was confined to the existing disturbance. We shared the same objective of avoiding proliferation of towers on the Mountain.

Visually, the Preferred Alternative has fewer effects, because placing the tower at the 9,500 ft. level will provide a backdrop consisting of trees and vegetation, leaving the tower less visible. The tower will be less than 200 ft. in height, and as a result, will not require lighting or red and white paint as mandated by the Federal Aviation Administration. Limiting the initial tower construction to 125 feet will allow for further visual analysis if and when full development is authorized.

## **PUBLIC INVOLVEMENT AND SCOPING**

Consultation began on July 24, 1997, with a presentation to the Hopi Council, and a subsequent site visit with the Hopi Cultural Resources Advisory Team, on August 12, 1997. General public involvement was initiated on October 20, 1997, through circulation of a Draft Environmental Assessment (EA). On November 10, 1997, the same document was mailed out to a number of registered radio users in the surrounding areas. A total of 158 documents were mailed out. As of December 1997, only 11 responses were received either via telephone or mail. Of these, 6 supported the proposal, 2 were neutral, and 3 were in opposition. The concerns voiced in letters of opposition to the project were mainly visual impacts and an opposition to development on sacred lands.

A revised EA with the maintenance yard location was mailed to the public on July 13, 1998, with a formal comment period ending August 13, 1998. The mailing list for all mailings of the EA included individuals, organizations, State and local agencies, and local Indian tribal governments. A total of 584 documents were mailed. Public notification of availability of the EA was published in the Arizona Daily Sun on August 11, 1998, and had a 30-day comment period. By September 30, 1998, only 4 comments were received. Two of these comments were in opposition due to religious beliefs. The other two were in support of the proposal, one with concerns over lighting, proliferation of towers, and tower height. All comments received during these comment periods are part of the project record, and were considered in this decision.

The first location chosen for the tower was in a relatively undisturbed portion of the Snowbowl permit area. Other proposals on the Mountain including the Snowbowl's own proposed expansion had affirmed and formalized the Forest Services requirement for Native American consultations. Initial consultation at the first proposed site led to the movement of the location to a previously disturbed area, recognized by all as a superior location.

## **ENVIRONMENTAL JUSTICE**

The issue of environmental equity and justice in natural resource allocation and decision-making is receiving increasing political and social attention. Following President Clinton's Executive Order 12898 (Federal Register, February, 1994) all federal land management agencies have been mandated to address environmental justice in nonwhite and/or low-income populations, with the goal of achieving environmental protection for all communities regardless of their racial and economic composition. The proposed communication site is located on previously disturbed areas that are currently being used by the Arizona Snowbowl. The concept of environmental justice was considered in this proposal and no effects were identified from this project.

## FINDING OF NO SIGNIFICANT IMPACT

Context. This project is a site-specific action that by itself does not have significant international, national, region-wide or statewide importance. The discussion of significance criteria that follows applies to the intended action and is within the context of local importance in the area associated with the Arizona Snowbowl Ski Resort.

Intensity. The following discussion is organized around the Ten Significance Criteria described in the National Environmental (NEPA) regulations (40 CFR 1508.27).

1. The analysis considered both beneficial and adverse effects. Impacts from the project are beneficial, with negligible adverse effects. Dust from construction may affect the immediate project area, but will be short term. Visual effects are negligible due to the fact that the tower is consistent with commercial equipment already in place in the permit area, therefore, will not change the character of the area. The backdrop of trees and topography significantly reduces the visibility of the tower. The tower will not create any new issues affecting wildlife in the area. The immediate and long-term effects will benefit the general public by improving emergency communications in northern Arizona. The EA contains complete discussion of the effects in *Chapter 3*.
2. There are no known adverse impacts to public safety. The intended action will not affect public health and safety. The purpose of the action is to improve emergency communications for the general public.
3. No unique characteristics of the geography, such as cultural resources and wetlands, will be adversely affected. The tower is to be placed in a previously disturbed equipment maintenance yard and will have no effect on wetlands, cultural resources, or geographical characteristics.
4. The effects on the quality of the human environment are not likely to be highly controversial. The most controversial effect would be the visibility of the tower, and it's impact on human perception of the San Francisco Mountain. Background views from Hwy 180 are available, but not without binoculars or spotting scopes. Middle-ground views from Hart Prairie and FR 151 are minimal due to the backdrop of trees and topography. Foreground views are consistent with other equipment views at the ski area. There were no cultural resources found in the disturbed area, and the general public does not have access to the maintenance yard; therefore, when taken as a whole, the effects are not likely to impact the casual observer. An alternative at lower elevations would have more towers and greater visual impact.
5. The degree of possible effects on the human environment are not likely uncertain, nor are there unique or unknown risks involved. The environmental effects are typical of communication sites located on the Coconino National Forest. The effects of this project will not be noticeable to the casual observer.
6. Site specific actions found as part of this decision do not set a precedent for future action, which may have significant effects, nor does this represent a decision in principle about a future consideration. A decision to establish a low power communication site at the Arizona Snowbowl maintenance yard does not establish any future precedent for other

actions that may have a significant effect. Future actions will be evaluated through the NEPA process and will stand on their own as to the environmental effects and project feasibility. Again, since the site is defined as one tower and one building, any proposal beyond this configuration would also require another Forest Plan Amendment.

7. These actions are not related to other actions that, when combined, will have significant impacts. Cumulative effects are documented in *Chapter 1* of the EA. In the *Cumulative Effects* section, the Arizona Snowbowl Ski Resort is reviewed for past actions such as expansions and upgrades, and anticipated effects of future proposals. Because this proposal is independent of other Snowbowl proposals, the cumulative impacts of continued operation of Snowbowl and the communication site proposals will be no greater than the total of the separate proposals.
8. This decision will not contribute to the loss or destruction of significant scientific, cultural, or historic resources. An archaeological survey was conducted (Dosh, 1998; Project Record #57) and no historic or cultural resources were found. There are no known scientific resources within the site location. The Forest Service is currently studying the Mountain to evaluate them for their eligibility for nomination to the National Register of Historic Places. Since the Preferred Alternative is located on a previously disturbed area, the building of this building and tower will not affect the significance for the National Register of Historic Places.
9. This decision will not adversely affect any threatened or endangered species of plants or animals or habitat critical for the management of these species. A biological evaluation Statement of No Concern was prepared (Project Record #44) and discussions were held with the Arizona Game & Fish Department. Their comment stated that they did not anticipate that the project would cause any measurable impacts to wildlife species (Project Record #25).
10. This decision does not violate or threaten to violate Federal, State, or local laws, or requirements imposed for the protection of the environment. This decision complies with the mandates of the Telecommunications Act of 1996. State and local governments were provided the EA, and did not respond with any concerns.

I find that implementing the Preferred Alternative does not constitute a major Federal action that would significantly affect the quality of the human environment in either context or intensity. I have made this determination after considering both positive and negative effects, as well as direct, indirect and cumulative effects of this action and foreseeable future actions.

I have found that the context of the environmental impacts of this decision is limited to the local area and is not significant. I have also determined that the severity of these impacts is not significant.

## **OTHER FINDINGS**

This decision meets the intent of and complies with the Coconino Forest Plan as amended by this decision.

The decision complies with relevant laws, including but not limited to the following: the Telecommunications Act of 1996, the National Historic Preservation Act of 1966 as amended; the Archaeological Resources Protection Act of 1979, the Native American Religious Act; the Wilderness Act of 1964, the National Forest Management Act of 1976; and the National Environmental Policy Act of 1969.

Biological evaluations and discussions with Arizona Game and Fish Department are complete. Cultural Resources Clearance and consultation with the State Historic Preservation Officer, and Arizona Tribal Governments is complete.

The decision also complies with Arizona State laws regarding natural resources protection, including but not limited to water quality, as well as county and city resource protection measures.

## **EFFECTIVE DATE AND IMPLEMENTATION**

This project will not be implemented sooner than five business days following the close of the appeal filing period established in the Notice of Decision in the *Arizona Daily Sun*. If an appeal is filed, implementation will not begin sooner than 15 calendar days following a final decision on the appeal. Although the policies will take effect at that time, I expect that the actual on-the-ground implementation will begin within the next three months.

## **ADMINISTRATIVE REVIEW**

This decision is subject to administrative review pursuant to 36 CFR 215 and 251 (251 for permit tee's only). For 215 and 251, a written notice of appeal must be filed with the Regional Forester within 45 days of the date that a notice of this decision is published in the *Arizona Daily Sun*. A notice of appeal must be fully consistent with the requirements found in 36 CFR 215 and 251. At a minimum, a written notice of appeal must include the following:

- State that your appeal is filed pursuant to 36 CFR 215 or 251.
- Provide your name, address and telephone number.
- Identify this Decision Notice by its title.
- Identify the decision or decisions you wish reviewed.
- State the reasons for your objections, including issues of fact, laws, regulation, or policy, and if applicable, specifically state how the decision violates law, regulation, or policy.
- Identify the specific change or changes in the decision that you seek.

A notice of appeals may include a request for stay to keep the decision from being implemented. A request for stay should provide the following information:

- A description of the specific actions to be stopped by the stay.

- Specific reasons why the stay should be granted. This should contain sufficient detail to permit the Reviewing Officer to evaluate and rule upon the stay request. At a minimum you should discuss the specific adverse effects of implementation upon you; harmful site-specific impacts or effect on resources in the area affected by the activity or activities to be stopped; and how the cited effects and impacts would prevent a meaningful decision on the merits of the appeal.

Appeals must be filed with the Regional Forester, Southwestern Region, 517 Gold Avenue SW, Albuquerque, New Mexico 87012; Attention: Appeals Contact Person.

For further information, contact Ken Jacobs at the Peaks Ranger District, (520) 527-8214.  
E-mail: [kajacobs@fs.fed.us](mailto:kajacobs@fs.fed.us)

/s/Jim Golden

8/25/00

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JIM GOLDEN  
Forest Supervisor  
Coconino National Forest

\_\_\_\_\_  
Date

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