Determination of NEPA Adequacy (DNA)
U.S. Department of Interior
Bureau of Land Management

OFFICE: ***Hassayampa Field Office (HFO)***

NEPA/TRACKING NUMBER: *DOI-BLM-AZ-P010-2014-0025-DNA*

CASEFILE/PROJECT NUMBER: *AZA-35918*

PROPOSED ACTION TITLE/TYPE: GovNET Inc. Communication Site Lease

LOCATION/LEGAL DESCRIPTION: G&SRM T. 3 N., R. 3 W., Section 28 Tract 37

APPLICANT (if any): *GovNET Inc.*

A. Description of the Proposed Action and any applicable mitigation measures
GovNET Inc. has filed an application for a communication site lease (AZA-35918). The request is for a 199' self-supporting 4-leg tower with a 16.5' wide by 20' long equipment building (shelter). Directly underneath the tower, a concrete pad (approximately 16.5' wide x 28' long) would hold the building and three 48v DC generators. Surrounding the building and tower is a proposed chain link fence approximately 40' wide x 45' long. Three 1,000 gallon LP propane tanks would be placed on another approximate 16' wide x 16' long separate concrete pad surrounded by a 20' wide x 20' long fence. The improvement of a 12' wide by 300' long new access road and a 28' wide x 28' long concrete helipad has also been requested. An unimproved access road, between helipad and tower site, would occur during construction but will not be maintained. Electrical access would come from nearby APS poles and a 5' wide x 60' long trench may be needed in order to take underground power to the site. Site entry and soil testing would be completed prior to construction. The applicant would like to start construction as early as July 1, 2014 and construction is expected to take approximately two months.

Three pictures, from the applicant's plan of development, are enclosed. Attachment 1 gives a general overview of the site location, including the helipad and placement of the road. Attachment 2 illustrates the scale and placement of the propane tanks, concrete pads, and shelter while Attachment 3 shows the tower.

The sum of the authorization is 0.06 acres, more or less. The location of the site is on the east peak of the White Tanks Mountain which is a designated communication site. If authorized, right-of-way AZA-35918 would be issued for a term of 30 years with the right to renew.

B. Land Use Plan Conformance
Land Use Plan (LUP) Name: Bradshaw Harquahala Resource Management Plan

Date Approved/Amended: **April 2010, as amended**

☐ The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decision(s):

☒ The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decision(s) (objectives, terms, and conditions):

This action has been reviewed for conformance with the Bradshaw-Harquahala Resource Management Plan (RMP) with respect to the Code of Federal Regulations (CFR) (43 CFR 1610.5) and BLM Manual 1601.04 C.2. It has been determined that the proposed action does comply with the objectives, terms, and conditions of the RMP. Specifically, this type of action is provided for in the under Lands and Realty Management, Land Use Allocations, LR-4 which states,

"Communication Site: Nine areas are designated to accommodate communication sites, shown on Map 9. These sites include Lone Mountain, Harquahala Mountain, Burnt Mountain, Valencia, Black Canyon City, and four sites in the White Tank Mountains (North, Middle, East, and West)."

It is also provided for in Lands and Realty Management, Management Actions, LR-20 which states,

"Accept applications for communication sites on a case-by-case basis and in accordance with the resource management prescriptions in this land use plan. BLM planning related to communication infrastructure must, in accordance with the Telecommunications Act of 1996, help facilitate implementing wireless telephone systems, in compliance with existing law, by making Federal lands and facilities available for communication sites."

Compliance with the RMP is also demonstrated under Lands and Realty Management, Land Use Authorizations, LR-24 which states,

"Continue to issue land use authorizations (right-of-way, leases, permits, easements) on a case-by-case basis and in accordance with resource management prescriptions in this land use plan."

This proposed action has been reviewed for conformance with these plans (43 CFR 1610.5-3, BLM Manual 1601.04C.2).

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

A Programmatic Environmental Assessment (EAR-AZ-020-8-83) was signed in 1978 which designated six peaks at White Tanks for communications purposes (East, West, West 2 Peaks, Middle, North, and North 2 Ridges). In 1994, the current Constitution of

the White Tanks Improvement Association (WTIA) was approved. On August 12, 2005, the White Tanks Communication Site Plan was approved which outlines such things as the communication site's goals and objectives, operation and maintenance, general roles and responsibilities, and conditions for construction, modifications or expansion. The Site Management Plan also carries forward the applicable guidance from the 1978 assessment, incorporates the applicable standards from the WTIA, and incorporates current policy and technical standards for better management of the White Tanks Communications Site. Overall management direction for the administration of communication sites is outlined in the U.S. C.F.R. and the BLM Handbook and applicable BLM Instructional Memoranda. Specific direction for site management planning, on designated communications sites, is contained in BLM Handbook 2860-1. Primary regulations and policy pertaining to issuance of right-of-way authorizations by the BLM are found in Title 43, C.F.R., Sections 2801-2803 and BLM Handbook 2860-1. The proposed action is in conformance with the above referenced analysis, Constitution, and Site Management Plan.

The Programmatic Environmental Assessment also contains a Cultural Resource Clearance (dated August 27, 1976), an Environmental Assessment Record (EAR) Fact Sheet (signed June 26, 1978) and incorporates a list of Special Stipulations for the White Tank Mountains Communication Site along with the Whit Tank Mountain Improvement Association Constitution And Bylaws.

D. NEPA Adequacy Criteria

1. **Is the proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the exiting NEPA document(s)? If there are differences, can you explain whey they are not substantial?**

   The primary function of the programmatic environmental assessment record (EAR) was to analyze the potential impacts of new communication site grants and leases on the designated White Tanks Communication Site. It explicitly examined, evaluated, and mitigated the effects of such uses as the proposed action which is within the same analysis area.

2. **Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

   Yes. There are no additional or new environmental concerns, interests, and resources that need to be addressed.

3. **Is the existing analysis valid in light of new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings,**

and updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. The East Peak of the White Tanks Mountain, where the proposed action is located, is a designated communication site and the programmatic environmental assessment was specifically conducted for actions such as these.

4. **Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

   Yes. All direct, indirect, and cumulative effects of the proposed action have been addressed in the existing NEPA document.

5. **Are the public involvement and interagency review associated with existing NEPA documents(s) adequate for the current proposed action?**

   Public involvement was also achieved by sending a Notice of Application (NOA) to all communication site holders located on the East Peak of the White Tanks Mountain. The NOA was signed and sent on March 24, 2014 and holders were given until May 2, 2014 to respond. No comments were received showing this is action is not controversial.

E. Persons/Agencies/BLM Staff Consulted

Name	Title	Resource/Agency Represented
Hillary Conner	HFO Realty Specialist	Rights-of-Way/BLM HFO
James Holden	Rangeland Specialist	Grazing/BLM HFO
Matt Plis	Enviro. Engineer	Safety/Hazards/BLM HFO
Bryan Lausten	Archaeologist	Cultural/Historic Sites/BLM HFO
Codey Carter	Wildlife Biologist	Wildlife/Habitat/BLM HFO
Victor Vizcaino	Recreation Specialist	Recreation/BLM HFO
Tom Bickauskas	Travel Mngt Specialist	Access/Travel/BLM HFO

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents. Attachment 4 is a summary of the 2014 clearances of the BLM interdisciplinary team members.

CONCLUSION:

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of NEPA.

Hillary Conner, BLM HFO Realty Specialist

Gloria Tibbetts, Planning & Environmental Coordinator

Rem Hawes, BLM HFO Manager

5/7/2014
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

ATTACHMENT 4

BLM Mitigation Measures / Other Remarks for AZA-35918

James Holden, Range Specialist:

- No Impact (NI) for Rangeland Health

No comment 4/14/2014

- Not Present (NP) for Cows

No comment 4/14/2014

Codey Carter, Wildlife Biologist:

- No Impact (NI) for Wildlife/Habitat (including TE/SS species).

"NI – If implemented according to their Biological Evaluation." 4/14/2014

Mary Skordinsky, Recreation Specialist:

- No Impact (NI) for Recreation.

"Existing facilities, existing footprint." 4/4/2014

Hillary Conner, Lands & Realty Specialist:

- No Impact (NI) for Rights-of-Way.

"White Tanks Mountain's East Peak (where the proposed action is located) is a designated communication site. This action is also located on a former site that had been reclaimed. No prior existing uses are/will be affected." 4/14/2014

Tom Bickauskas, Travel Management Specialist:

- No Impact (NI) for Access/Travel.

"Existing route serves site. No public access is allowed, thus no concerns for access." 4/14/2014

Bryan Lausten, Archaeologist:

- Not Present (NP) for Cultural/Historical Sites.

"No stipulation besides the normal discover stipulation (see below)." 4/28/2014

"Any cultural and/or paleontological resource (historic or prehistoric site or object) discovered by the holder, or any person working on his behalf, on public or Federal land shall be immediately reported to the Bureau of Land Management authorized officer. The holder shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the authorized officer to determine appropriate actions to prevent the loss of significant cultural or scientific values."