



Environmental Assessment

Department of
Commerce

National
Telecommunications
and Information
Administration

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Pascua Yaqui Fixed Wireless Sites – Coolidge, Guadalupe, Marana, Milagros, and Old Pascua

Maricopa, Pima, and Pinal County, Arizona

For Information Contact: Mr. Josh Fitzpatrick
1401 Constitution Avenue, NW
Washington, D.C. 20230
202.834.3123
www.ntia.gov

Table of Contents

- 1.0 Executive Summary 1**
- 2.0 Purpose and Need 1**
- 3.0 Description of Proposed Action and Alternatives 3**
 - 3.1 Introduction 3
 - 3.2 Proposed Action 3
 - 3.3 No Action Alternative 9
- 4.0 Description of the Affected Environment 9**
 - 4.1 Noise 9
 - 4.2 Air Quality 9
 - 4.3 Geology and Soils 9
 - 4.4 Water Resources 10
 - 4.5 Biological Resources 11
 - 4.6 Historic and Cultural Resources 12
 - 4.7 Aesthetic and Visual Resources 13
 - 4.8 Land Use 13
 - 4.9 Infrastructure 14
 - 4.10 Socioeconomic Resources 14
 - 4.11 Human Health and Safety 14
- 5.0 Analysis of Environmental Impacts 15**
 - 5.1 Noise 15
 - 5.2 Air Quality 15
 - 5.3 Geology and Soils 15
 - 5.4 Water Resources 15
 - 5.5 Biological Resources 16
 - 5.6 Historic and Cultural Resources 17
 - 5.7 Aesthetic and Visual Resources 19
 - 5.8 Land Use 20
 - 5.9 Infrastructure 20
 - 5.10 Socioeconomic Resources 20
 - 5.11 Human Health and Safety 20
 - 5.12 Cumulative impacts 21
- 6.0 Applicable Environmental Permits and Regulatory Requirements 22**
- 7.0 Consultations 23**
- 8.0 References 26**

Table of Tables

Table 4-1: Mapped Soils.....	10
Table 4-2: Documented Depth to Water	10
Table 4-3: Non-Aqueous Federally Endangered and Threatened Species	11
Table 4-4: Historic and Cultural Resources Identified with Project APEs	13
Table 4-5: Surrounding Land Uses	14
Table 5-1: Historic and Cultural Resources Identified with Project APEs	19
Table 6-1: Potential Applicable Statutory, Regulatory, and Other Requirements.....	22

APPENDIX A - Site Maps and Photographs

APPENDIX B - Air Quality

APPENDIX C - Geology and Soils

APPENDIX D - Water Resources

APPENDIX E - Biological Resources

APPENDIX F - Historic and Cultural Resources

APPENDIX G - List of Preparers

1.0 Executive Summary

The Pascua Yaqui Tribe was awarded funds under the Tribal Broadband Connectivity Grant of the National Telecommunications and Information Administration (NTIA) for the construction and modification of five (5) wireless facilities located throughout Maricopa, Pima, and Pinal County, Arizona. The Proposed Action is being completed as part of a larger initiative to improve communications infrastructure for the Pascua Yaqui Tribe. Additional actions that are proposed using the same grant funding, while functionally independent from the Proposed Action, include approximately 17,500 feet of proposed underground fiber within the newly constructed housing development Pascua Yaqui #7 that would service 122 homes and approximately 17.5 miles of proposed aerial and underground fiber that would run from an existing telecommunications tower site to an existing ISP Core facility located on the Pascua Yaqui Reservation in New Pascua. These two actions, which are also subject to the National Environmental Policy Act, are being assessed separately from the Proposed Action.

The Proposed Action would improve access to reliable and modern wireless communications capabilities for the Pascua Yaqui Tribe and surrounding communities. Benefits to the population would include, but not be limited to, improved communications infrastructure, increased educational and economic opportunities, and better access to healthcare services.

The Proposed Action is comprised of two antenna collocation projects (one located on a building roof top, and one located on an existing self-supporting tower) and three are new monopole telecommunications structures. Throughout the planning process, special care was taken to optimize existing sites, utilizing existing structures and towers where possible, or to otherwise select site locations that were deemed to have a low likelihood to result in adverse impacts to the natural or human environment.

The Proposed Action is subject to the National Environmental Policy Act (NEPA) codified at 42 U.S.C. 4321, et seq; this Environmental Assessment is prepared in accordance with NEPA.

2.0 Purpose and Need

Purpose

The purpose of the Proposed Action is to provide reliable wireless voice and data communications for the Pascua Yaqui Tribe and populations in areas surrounding the Proposed Action sites, which would include between 100 and 450 tribal households per tower. The enhanced capabilities and reliability of voice and data communications resulting from the proposed action would provide additional economic and educational opportunities and access to previously inaccessible telehealth care services for the Pascua Yaqui Tribe and surrounding communities.

Need

Native American tribes and reservations are consistently underserved communities as it relates to access to fiber and broadband communications infrastructure, which at one time was considered a luxury, but is now a basic utility for households and businesses. While improvements to communications technologies

continue to evolve and improve, tribal communities are often located in rural areas that are geographically isolated with low population density, resulting in a lack of the necessary investment in communications infrastructure. Further, the use of alternative means of such communication (such as satellite internet access) are prohibitively expensive for members of these communities. The lack of investment in such infrastructure results in disparities in the education, economic opportunities, health, and overall quality of life for current and future members of these communities. The Broadband Connectivity Grant from the NTIA provides needed access to funding for tribal communities such as the Pascua Yaqui Tribe to help reduce such disparities.

3.0 Description of Proposed Action and Alternatives

3.1 Introduction

NEPA requires that the NTIA evaluate both the Proposed Action as well as reasonable alternatives that would also accomplish the purpose and need of the Proposed Action. At minimum, a No Action Alternative must be considered as part of the Alternatives Analysis.

3.2 Proposed Action

The Proposed Action is comprised of five individual telecommunications facilities, including three proposed monopole towers and two antenna collocation projects (one located on an existing self-support lattice tower and one located on a building roof top).

Construction work for the proposed monopole sites (Coolidge, Marana, and Milagros) would begin with the project areas being cleared and graded as necessary using a mini-excavator / Skid Steer and a 4-foot diameter caisson being drilled at the tower center to a depth of 15 feet below ground surface. Additional excavation activities would include preparation for tower grounding and fiber and power vaults and associated conduits.

Following initial civil work, concrete would be poured for the tower foundation and generator pads to be located in the tower compound. Following curing, concrete inspection and strength testing would be completed.

Once concrete inspections and strength testing was completed, cranes with a maximum reach of 100 feet would be utilized to assemble the top sections of the proposed monopoles. Ice bridges, antennas and cables, vaults and conduits, generators, and the grounding systems would then be installed, followed by backfill and compaction activities. Following completion of equipment installation and power and fiber connection, power up and testing activities would be completed. Installation of gravel and landscaping (as necessary), fencing, security hardware, and site signage would mark the completion of construction for each of the proposed monopole sites.

Similar methodologies would be used for the collocation activities at the existing self-support lattice facility (Old Pascua) but limited to the installation of new equipment within the existing tower facility. Construction methodologies for the Guadalupe site, which is a collocation on a building rooftop, would also be limited to the installation of equipment on the subject building and would require no ground disturbance.

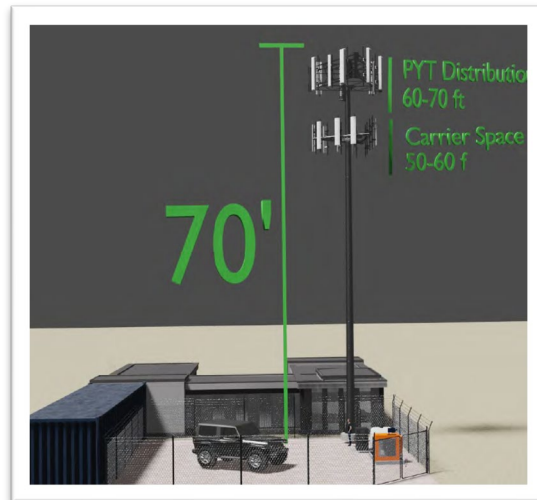
Generators that are proposed to be installed at each of the tower sites would utilize outdoor propane tanks as a fuel source. Generators would be scheduled to run for 15 minutes each Monday between 9:00am and 11:00am local time. The activity would be monitored to determine correct operation and voltage. The generators would also run in an emergency situation where the commercial power is in a disrupted state.

The site locations and additional site-specific design details for each of the sites are described below. Site maps, plans, and photographs are also provided in Appendix A.

Coolidge

The Coolidge site is located on privately- owned land that is not owned by the Pascua Yaqui Tribe. The project area is located in an area that does not appear to have been previously disturbed. A new 75-foot tall monopole telecommunications structure and associated ground-level equipment (which would include an outdoor propane-fueled backup generator, an approximate 8-foot by 4-foot pad, and an approximate 22-inch by 29-inch by 48-inch equipment cabinet) would be constructed within an approximate 40-foot by 40-foot fenced compound. The proposed facility would include an approximate 130-foot long underground fiber route. Fiber connections to a 3rd party carrier would be made via a hand vault that would be installed just outside the proposed compound. The 3rd party carrier would bring fiber to the site vault using existing rights-of-way and/or established easements.

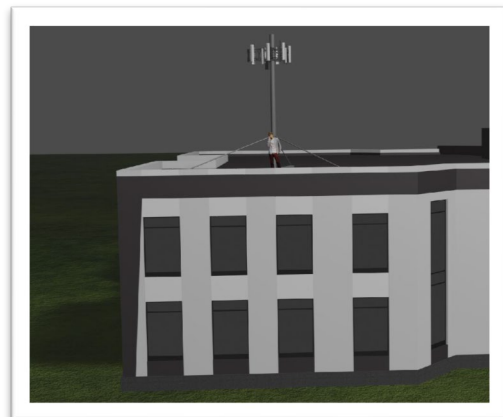
Coordinates: 32°58'38.17"N, 111°31'14.39"W



Guadalupe

The Guadalupe site is located on fee land owned by the Pascua Yaqui Tribe. A new 20-foot tall non-penetrating roof mount telecommunications structure and antennas would be installed on the rooftop of the Pascua Yaqui Tribal Complex Building. Pre-existing fiber connections are already available at the subject building.

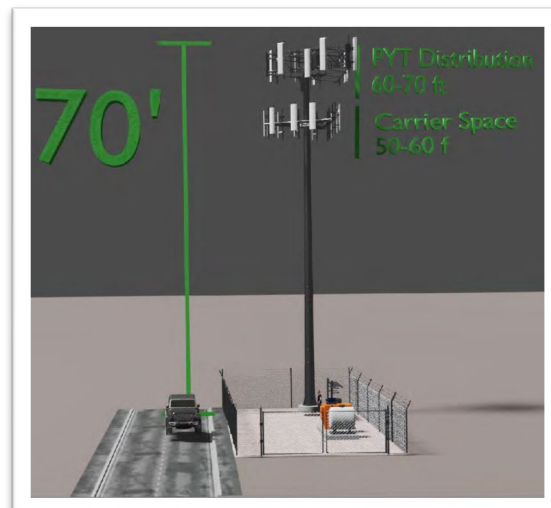
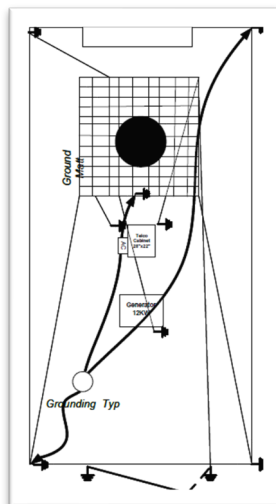
Coordinates: 33°21'38.5"N, 111°57'42.9"W



Marana

The Marana site is located on fee land owned by the Pascua Yaqui Tribe. The project area is located in an area that appears to have been previously cleared on multiple occasions. A new 75-foot tall monopole telecommunications structure and associated ground-level equipment (which would include an outdoor propane-fueled backup generator, an approximate 8-foot by 4-foot pad, and an approximate 22-inch by 29-inch by 48-inch equipment cabinet), would be constructed within an approximate 25-foot by 55-foot fenced compound. The proposed facility would include an approximate 85-foot long underground fiber route. Fiber connections to a 3rd party carrier would be made via a hand vault that would be installed just outside the proposed compound. The 3rd party carrier would bring fiber to the site vault using existing rights-of-way and/or established easements.

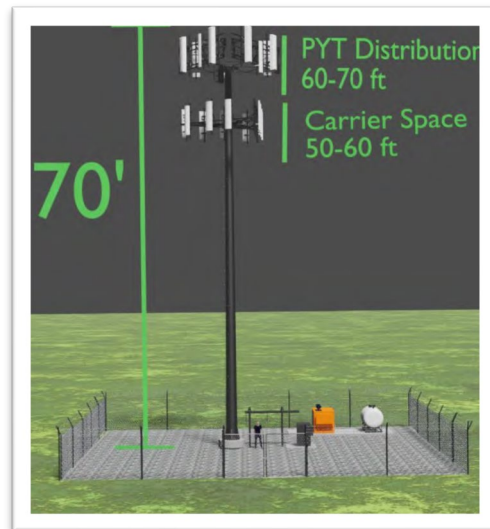
Coordinates: 32°26'48.2"N, 111°12'55.6"W



Milagros

The Milagros site is located on fee land owned by the Pascua Yaqui Tribe. The project area is located in an area that appears to have been previously graded. A new 75-foot tall monopole telecommunications structure and associated ground-level equipment (which would include an outdoor natural gas or propane-fueled backup generator, an approximate 8-foot by 4-foot pad, and an approximate 22-inch by 29-inch by 48-inch equipment cabinet) would be constructed within an approximate 40-foot by 40-foot fenced compound. The proposed facility would utilize an approximately 100-foot long aerial fiber route that would span from a proposed pole within the proposed tower compound to an existing pole adjacent to W 44th Street. The 3rd party fiber carrier would bring fiber to the proposed pole using existing rights-of-way and/or established easements.

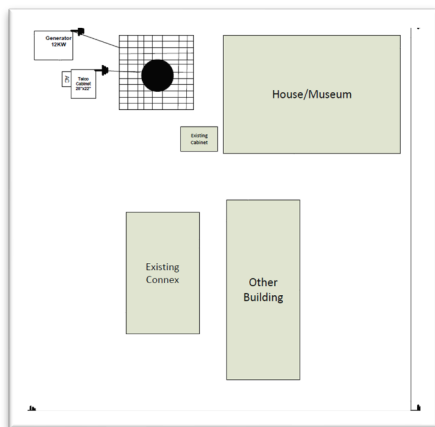
Coordinates: 32°11'5.6"N, 110°59'1.55"W



Old Pascua

The Old Pascua site is located on fee land owned by the Pascua Yaqui Tribe. Antennas would be collocated on an existing 80-foot tall self-supporting lattice telecommunications structure and associated ground-level equipment would be installed within an existing fenced compound, including an approximate 5-foot by 10-foot backup generator/outdoor propane tank pad, an approximate 64-inch by 36-inch by 36-inch equipment cabinet, an approximately 100-foot long fiber route to an established, pre-existing fiber connection, and a power route that would be approximately 50 feet long (option 1) or 65 feet long (option 2). All construction activities would take place within the existing compound.

Coordinates: 32°14'53.34"N, 110°59'9.71"W



No Action Alternative

The “No Action” Alternative, which must be assessed in accordance with Federal NEPA regulations, assumes no Federal funding is provided by the Broadband Connectivity Grant of the NTIA for the construction and modification of wireless telecommunications facilities. The existing communications infrastructure in areas of the Proposed Action would continue to operate in their current capacity with no changes to communications capabilities for the Pascua Yaqui Tribe or surrounding communities and would provide no relief to the unserved or underserved communities of the Pascua Yaqui Tribe.

Benefits of the No Action Alternative would include avoiding any potential impacts to the project site locations as a result of construction activities for the new tower facilities (such as the generation of emissions of particulate matter, noise, and solid waste or impacts to any cultural resources) as well as any potential impacts to aesthetics in areas surrounding the project sites.

4.0 Description of the Affected Environment

4.1 Noise

Noise at the project locations would presently originate from adjacent roadways and residential, municipal, and commercial developments.

4.2 Air Quality

Under the Clean Air Act (CAA), the US Environmental Protection Agency (USEPA) establishes National Ambient Air Quality Standards (NAAQS) to protect public health and welfare (see 40 CFR 50). The CAA requires states to regulate air pollution emission sources to meet and maintain NAAQS, which establish maximum acceptable concentrations for criteria pollutants, including nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀), particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}), ozone (O₃), and lead.

Three of the Proposed Action sites (Coolidge, Guadalupe and Milagros) are located in nonattainment areas for PM₁₀. The Coolidge site is also located within a nonattainment area for ozone (O₃) (see Appendix B).

According to the USEPA, the 90th percentile score for 2023 daily Air Quality Index (AQI) values of Maricopa County (the location of the Guadalupe site) is 112. The 90th percentile score of Pima County (the location of the Milagros, Marana, and Old Pascua sites) is 84, and the 90th percentile score for Pinal County (the location of the Coolidge site) is 100 (see Appendix B).

4.3 Geology and Soils

Geologically, Proposed Action sites are located within the Basin and Range Physiographic Province of Arizona, which is characterized by long mountain ranges and flat dry deserts and spans from eastern California to central Utah and from southern Idaho into Mexico (NPS 2023).

According to the USDA Web Soil Survey (Appendix C), soils located within the Proposed Action sites are as indicated in Table 4-1 below:

Table 4-1: Mapped Soils

Site	Mapped Soils	Prime Farmland Rating
Coolidge	Laveen loam (28)	Prime farmland if irrigated
Guadalupe	Valencia sandy loam (Va)	Prime farmland if irrigated
Marana	Gila loam, 0 to 1 percent slopes (GbA)	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season
Milagros	Grabe silty clay loam (Gm)	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season
Old Pascua	Cave gravelly loam, 0 to 5 percent slopes (CaB)	Not prime farmland
	Grabe soils, 0 to 3 percent slopes (GoB)	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season

Four of the five Proposed Action sites are in areas with soils that would be considered prime farmlands, as defined the Farmland Protection Policy Act, administered by the U.S. Department of Agriculture. However, according to the USDA Web Soil Survey, the soils for each of the four sites would be considered prime farmland only if irrigated. None of the Proposed Action sites are actively irrigated for agricultural use. Additionally, none of the Proposed Action sites were identified on the Protected Agricultural Lands Database.

4.4 Water Resources

4.4.1 Surface Water

None of the Proposed Action sites are located within or near surface waters. Additionally, the U.S. Fish and Wildlife Service’s (USFWS) National Wetlands Inventory indicated no wetlands within or in the vicinity of the footprint of the Proposed Action sites (Appendix D).

4.4.2 Groundwater

According to the USEPA, the Milagros, Marana, and Old Pascua sites are located within the Upper Santa Cruz & Avra Basin Sole Source Aquifer (see Appendix D). Based on a review of the Arizona Department of Water Resources Groundwater Site Inventory, depth to groundwater at each of the proposed project locations is likely greater than 90 feet. Table 4-2 provides the most recent groundwater depth measurements in closest proximity to the project areas.

Table 4-2: Documented Depth to Water

Site	Depth to Water (Most Recent Year Measured)	Proximity to Project Site
Coolidge	597 feet bls (2018)	0.25 – 0.5 miles
Guadalupe	194 feet bls (2018)	0.5 – 0.75 miles
Marana	202 feet bls (2020)	0.25 – 0.5 miles
Milagros	90 – 127 feet bls (2019)	0.5 – 0.75 miles
Old Pascua	139 feet bls (2020)	0.25 – 0.5 miles

4.4.3 Coastal Zone, Estuary and Inter-tidal Areas

None of the Proposed Action sites are located within or near coastal zones, estuaries, or inter-tidal areas.

4.4.4 Floodplains

Based on a review of the appropriate Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panels, the Proposed Action sites are not located within any 100-year floodplains (Appendix D).

4.4.5 Wild and Scenic Rivers

According to the National Wild and Scenic Rivers System, none of the Proposed Action sites are located near wild or scenic rivers.

4.5 Biological Resources

4.5.1 Threatened and Endangered Species

Official species lists generated from the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool were reviewed for federally listed and proposed threatened and endangered species that may be present at the Proposed Action sites. Multiple federally listed endangered and threatened species have been identified by the USFWS IPaC tool as potentially occurring within the vicinity of the Proposed Action sites. A list of species potentially occurring within the project area of each site is listed below. Further discussion of specific habitat generally occupied by the identified species is included in Section 5.5 and within the Informal Biological Assessments prepared for each of the Proposed Action sites and included in Appendix E.

Table 4-3: Federally Endangered or Threatened Species

Species	Federal Status
Jaguar <i>Panthera onca</i>	Endangered
Ocelot <i>Leopardus (=Felis) pardalis</i>	Endangered
California least tern <i>Sterna antillarum browni</i>	Endangered
Yellowbilled Cuckoo <i>Coccyzus americanus</i>	Threatened
Arizona eryngo <i>Eryngium sparganophyllum</i>	Endangered
Pima pineapple cactus <i>Coryphantha scheeri var. robustispina</i>	Endangered
Huachuca water-umbel <i>Lilaeopsis schaffneriana var. recurva</i>	Endangered
Sonoran Pronghorn <i>Antilocapra americana sonoriensis</i>	Experimental Population, Non-Essential
Gila chub <i>Gila intermedia</i>	Endangered
Sonoyta mud turtle <i>Kinosternon sonoriense longifemorale</i>	Endangered

4.5.2 Critical or Threatened / Endangered Habitat

The Proposed Action is located within the Arizona Upland/ Eastern Sonoran Basins and Gila/Salt Intermediate Basins of the Sonoran Basin and Range eco-region. This region consists of flat to gently sloping basins and valleys composed of bajadas, alluvial fans, plains, eroded washes, stream terraces, and floodplains. Vegetation includes creosote bush and bursage, saguaro, foothills paloverde, ironwood, triangle-leaf and white bursage, ocotillo, mesquite, acacias, chollo cactus, fourwing saltbush, big galleta, and scattered ironwood and littleleaf paloverde (USGS).

The Proposed Action is comprised of two antenna collocation projects (one located on a building roof top, and one located on an existing self-support lattice tower) and three proposed monopole telecommunications structures which would be located in areas that are heavily developed or otherwise have little to no natural environment.

No designated or proposed critical habitat is located within the vicinity of the Proposed Action sites. Additionally, no suitable habitat for endangered or threatened species exists within the footprint of the Proposed Action sites.

4.5.3 Migratory Birds and Their Habitat

Executive Order 13186 requires Federal agencies to work with the USFWS to provide protection for migratory birds. These species are protected under the 1918 Migratory Bird Treaty Act (16 USC 703), which prohibits the taking of any migratory birds, their parts, nests, or eggs.

The Proposed Action sites are located within the Pacific North American Migratory Bird Flyway. Based on the developed or previously disturbed nature of the Proposed Action sites, it is anticipated that the sites would provide less than optimal habitat for migratory birds. Minimal vegetation may be present that could provide opportunities for migratory bird nesting or foraging or the general presence of migratory birds. Further, the presence of migratory birds engaged in migrating activities cannot be ruled out in the general vicinity of the Proposed Action sites and the proposed tower structures may provide opportunities for nesting and/or perching.

4.5.4 Wetlands Habitat

None of the Proposed Action sites are located within areas that would provide wetlands habitat for protected species.

4.6 Historic and Cultural Resources

4.6.1 Archaeological and Architectural Resources

The Proposed Action sites consist of a modern building located on fee land owned by the Pascua Yaqui Tribe (Guadalupe), an existing telecommunications facility located on fee land owned by the Pascua Yaqui Tribe (Old Pascua), and three proposed telecommunications facilities that would be located in areas that are not occupied by any historic structures. Of those three proposed facilities, two facilities would be located on

fee land owned by the Pascua Yaqui Tribe (Milagros and Marana) and one facility would be located on privately owned fee land (Coolidge).

A Class III Cultural Resources Survey was conducted for each of the Proposed Action sites for the purpose of identifying and addressing any potential impacts to historic and cultural resources that may be located within the areas of potential effects (APEs) for the Proposed Action. A summary of identified historic and cultural resources identified for each site is listed in Table 4-4 below:

Table 4-4: Historic and Cultural Resources Identified with Project APEs

Site	Resource within Direct APE	Resources within Visual APE
Coolidge	None previously recorded; No artifacts or cultural features identified during field survey	Six (6) previously recorded cultural resources
Guadalupe	None previously recorded; No artifacts or cultural features identified during field survey	216 previously recorded cultural resources
Marana	None previously recorded; No artifacts or cultural features identified during field survey	Four (4) previously recorded cultural resources
Milagros	One previously recorded site (AZ BB:13:17 (ASM); No artifacts or cultural features identified during field survey	Eight (8) previously recorded cultural resources
Old Pascua	One NRHP-listed site (Antonio Matus House and Property) within portions of parent tract; No artifacts or cultural features identified during field survey	11 previously recorded cultural resources

4.6.2 Native American Traditional, Cultural or Religious Resources

Between 17 and 19 federally recognized tribes were identified that may attach religious and cultural significance to historic properties within the areas of each of the Proposed Action sites. Interested tribes were initially contacted on August 4, 2023.

4.7 Aesthetic and Visual Resources

The Proposed Action sites are located in areas that are generally characterized by residential, commercial, and transportation developments.

With the exception of the Milagros site, which is located approximately 350 feet east of the Santa Cruz River Park beyond US Interstate 19, no recreational areas, natural features, notable architectural features, or national or state parks are located within the vicinity of the Proposed Action sites.

4.8 Land Use

The Proposed Action sites consist of a municipal building (Guadalupe), an existing telecommunications facility (Old Pascua), and three proposed telecommunications facilities that would be located in areas that are not currently developed.

Surrounding land uses for each site are described in the table below.

Table 4-5: Surrounding Land Uses

Site Name	Surrounding Land Uses
Coolidge	Commercial and residential development
Guadalupe	Commercial, municipal, and residential development
Marana	Residential, municipal, and commercial development, agricultural and, and undeveloped land
Milagros	Municipal and residential development, US Interstate 19, and Santa Cruz River Park
Old Pascua	Commercial, municipal, and residential development

4.9 Infrastructure

Infrastructure at the Proposed Action sites generally consists of public roads that would be utilized to access the proposed project locations. Additionally, the Guadalupe site is located on an existing building rooftop, and the Old Pascua site is occupied by existing communications infrastructure (a self-supporting lattice tower).

No additional infrastructure, such as power, water, or communications, are located within the footprint of the Proposed Action sites.

4.10 Socioeconomic Resources

The Proposed Action is located in areas that would service members of the Pascua Yaqui Tribe and surrounding communities. An estimated 14.7, 10.7, and 11.7 percent of the populations of Pima, Pinal, and Maricopa County (where the Proposed Action would take place), respectively live below the poverty level, respectively. By comparison, an estimated 46 percent of the Pascua Yaqui Tribe live below the poverty level (Arizona Rural Policy Institute), indicating that members of the Pascua Yaqui Tribe disproportionately live in poverty.

4.11 Human Health and Safety

The Proposed Action sites consist of a municipal building rooftop (Guadalupe), an existing telecommunications facility (Old Pascua), and three proposed telecommunications facilities. None of the current operations at the proposed project locations present concerns to human health and safety. Additionally, none of the Proposed Action sites were identified on the National Priority List or any other hazardous material databases identified in the USEPA EnviroAtlas tool.

One project location (Coolidge) is located within the vicinity of a previously documented Federal Facility Hazardous Waste Docket site (San Carlos Irrigation Project Coolidge Maintenance Facility), which is located approximately 100 feet east of the proposed project footprint at its closest point and 200 feet east of the proposed tower location. This facility is also listed on the RCRA-Inactive database, and the Arizona Department of Environmental Quality (AZDEQ) Preliminary Assessment and Site Investigation (PASI) database, but there were no database listings related to this facility that were indicative of a release of hazardous wastes that would have potentially impacted the Coolidge site.

5.0 Analysis of Environmental Impacts

5.1 Noise

The Proposed Action would result in a negligible and temporary increase in noise levels during construction and installation activities. Construction activities would occur only during daytime hours. Following construction, increases in noise levels would also be negligible and would result from occasional and temporary noise associated with the operation of backup generators in the event of a power outage in the project location areas.

A No Action Alternative would not result in a change in noise levels at the Proposed Action sites and would therefore have no adverse noise impacts.

5.2 Air Quality

The Proposed Action would result in negligible and temporary increase in air emissions at and near the Proposed Action sites during construction and installation activities as a result of equipment operation and ground disturbing activities. Both equipment operation and ground disturbing activities would be temporary and would occur over only a few days at each Proposed Action site. In order to minimize the generation of airborne particulate (dust) emissions as a result of ground disturbance, best management practices (BMPs) (e.g. wetting and stabilizing exposed soils, minimizing exposed soils, and minimizing traffic across unpaved areas) would be implemented. Additionally, the maximum footprint of the Proposed Action at each of the sites would be less than 0.1 acre, thus minimizing the amount of exposed soil subject to dust generation. Further, development activities would be subject to both state and local air quality regulations which have been developed to address current air quality non-attainment and in accordance with the Arizona State Implementation Plan (SIP). Following construction, the operation of backup generators would contribute minimally to air emissions. Generators would operate on natural gas and propane and would only operate for short periods of time in the event of a power outage in the project location areas. Only generator engines meeting current EPA air quality standards would be utilized.

A No Action Alternative would result in no construction or operations activities at the project locations and therefore would have no impact to the air quality within the vicinity of the Proposed Action sites.

5.3 Geology and Soils

The Proposed Action would not result in any ground disturbing activities for the Guadalupe site, and ground disturbing activities for the remaining four sites would take place in areas measuring less than 0.1-acres. Based on the small scale of soil disturbance that would be required for the Proposed Action, impacts to the quality of soil or surrounding soil and geologic conditions would be negligible.

A No Action Alternative would result in no construction or installation activities at the Proposed Action sites and therefore no impact to geologic conditions or soils.

5.4 Water Resources

The Proposed Action would not be located within the vicinity of any surface waters. Further, although the Proposed Action at the Milagros, Marana, and Old Pascua sites are located within the Upper Santa Cruz & Avra Basin sole source aquifer area, the anticipated groundwater levels

at the Proposed Action sites where ground disturbing activities are required would be well beneath the extent of any excavation activities, no water withdrawals are proposed, and the passive uses of the proposed communications tower sites are not anticipated to result in adverse effects to groundwater quality. Based on the small footprint and relatively flat terrain of the Proposed Action sites, changes to existing stormwater runoff rates or impacts to water resources as a result of erosion and sediment runoff are expected to be non-existent or negligible. Where applicable sediment and erosion control best management practices would be implemented, such as silt fencing or sediment traps, and erosion control mats.

A No Action Alternative would result in no construction activities at the Proposed Action sites and therefore would have no impact to water resources.

5.5 Biological Resources

Official species lists generated from the USFWS IPaC System were reviewed for species that may be present at the Proposed Action sites. Based on a review of the information provided by the IPaC tool and site inspections, none of the Proposed Action sites were determined to provide suitable habitat for federally listed or proposed species. Based on the previously disturbed nature of the Proposed Action sites and/or the lack of suitable habitat, the NTIA Environmental Program Officer made a “no effect” determination for each of the Proposed Action sites and site-specific consultation with the USFWS beyond the official species list requests was not necessary. Additionally, Project Evaluation Requests were sent to the Arizona Game and Fish Department (AZGFD) for each of the Proposed Action sites. The AZGFD responded indicating that “As the proposed project is located in a previously disturbed area, with the present habitat providing relatively low value to wildlife, the Department does not anticipate any significant adverse impacts to wildlife resources would occur as a result of this project.” Documentation of the Informal Biological Assessments prepared for each Proposed Action site and AZGFD consultation is provided in Appendix E. A list of species identified by USFWS as potentially occurring at the Proposed Action sites along with suitable habitat descriptions and a finding of effect for each is provided in Table 5-1 below.

A No Action Alternative would result in no construction activities at the Proposed Action sites and therefore would have no impact to biological resources.

Table 5-1: Federally Endangered or Threatened Species Findings Summary

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
Jaguar	<i>Panthera onca</i>	Endangered	Close association with water, dense cover, sufficient prey, and avoidance of highly disturbed areas	No Suitable Habitat; No Effect
Ocelot	<i>Leopardus pardalis</i>	Endangered	Habitats with good cover; tends to keep hidden in dense brush during daytime; dens in caves, hollow trees, thickets, or amongst buttress roots of large trees	No Suitable Habitat; No Effect
California least tern	<i>Sterna antillarum browni</i>	Endangered	Nests usually on open, flat beaches along lagoon or estuary margins; sometimes on mud or sand flats a distance from the ocean or on artificial islands created from dredge spoils	No Suitable Habitat; No Effect

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
Yellow-billed Cuckoo	<i>Coccyzus americanus</i>	Threatened	Wooded habitat with dense cover and water nearby, including woodlands with low, scrubby, vegetation, overgrown orchards, abandoned farmland and dense thickets along streams and marshes.	No Suitable Habitat; No Effect
Arizona eryngo	<i>Eryngium sparganophyllum</i>	Endangered	Occurs in riparian zones and marshes within Pinon-Juniper Woodland and Madrean Evergreen Woodland (a mild winter-wet summer woodland of oaks and pines such as the Emory Oak and Chihuahua pine)	No Suitable Habitat; No Effect
Pima pineapple cactus	<i>Coryphantha scheeri var. robustispina</i>	Endangered	Grows in alluvial valleys, mesas, and hillsides in desert, desert grassland, or southwestern oak woodlands (Sonoran Desert scrub or the ecotone between desert scrub and desert grassland)	No Suitable Habitat; No Effect
Huachuca water-umbel	<i>Lilaeopsis schaffneriana var. recurva</i>	Endangered	Occurs in rivers, springs, streams, and cienegas, which are marshy or meadow-like wetlands surrounding by semi-arid vegetation	No Suitable Habitat; No Effect
Sonoran Pronghorn	<i>Antilocapra americana sonoriensis</i>	Experimental Population; Non-Essential	Habitat is characterized by broad alluvial valleys separated by block-faulted mountains; These valleys are partially filled with clay, silt and alluvium deposited from sheet erosion and ephemeral streams; The valleys are fairly level, with drainage to the north and west through a braided wash system in the center of the valleys; Mountain ranges generally run in a northwest to southeast direction; The range of Sonoran pronghorn in Arizona is approximately 1 million ha in size; Mean elevations of the valleys vary from 400 - 1,600 feet	No Suitable Habitat; No Effect
Gila chub	<i>Gila intermedia</i>	Endangered	Pools in creeks and small rivers, springs, and cienegas	No Suitable Habitat; No Effect
Sonoyta mud Turtle	<i>Kinosternon sonoriense longifemorale</i>	Endangered	Inhabits spring-fed pools, ponds, and stream courses with perennial or near-perennial water; Utilizes nearby terrestrial habitat with moist soils; Only one remaining location within United States over 100 miles from Proposed Action sites	No Suitable Habitat; No Effect

5.5.1 Migratory Birds and their Habitats

Per the USFWS “Recommended Best Management Practices for Communication Tower Design, Siting Construction, Operation, Maintenance, and Decommissioning” (USFWS, 2021), “evidence suggests that night-migrating songbirds are either attracted to or disoriented by tower obstruction warning lighting systems, especially during overcast (i.e., low cloud ceiling), foggy, or otherwise low visibility conditions. Birds aggregate in larger numbers at towers with non-flashing lights compared to those with flashing lights, although birds aggregate at flashing lights during the “on” phase, they disperse during the “off” phase. Additionally, birds moving across the landscape at night (e.g. owl and seabirds) can collide with communications tower wires when they are placed in high movement areas.” Further, communication towers may cause direct and indirect bird

mortality through collisions with towers or guy wires or from exhaustion from circling a tower; through construction, operation, and maintenance activities; and significant loss of fat reserves spent while circling towers, leading to reduced survival during long migrations. Recommendations are provided by the USFWS within the previously referenced guidance including, but not limited to, limiting new towers to 199 feet in height, avoiding the use of guy wires, avoiding lighting where possible or equipping towers with avian friendly lighting, scheduling vegetation removal outside of peak bird breeding seasons, conducting nest clearance surveys if vegetation removal is necessary during the bird breeding season, avoiding active nests during vegetation removal, scheduling tower maintenance activities around nesting seasons for any birds nesting on tower structures, and obtaining the proper permits should maintenance work be necessary during nesting season when nests are present

As discussed previously, although all Proposed Action sites are located within previously disturbed and/or urban areas, the presence of migratory birds, including nesting migratory birds cannot be ruled out. All proposed towers would be less than 199 feet in height, would not be equipped with guy wires, and no tower lighting would be used, thus minimizing the potential for migratory bird collisions with the towers or other adverse effects that may occur as a result of lighting. The Arizona Department of Transportation (AZDOT) has developed an Environmental Planning Migratory Bird Mitigation Guidance (2018) which requires contractors to avoid active bird nests during the migratory bird breeding season (March 1 – August 31). During the non-breeding season (September 1 – February 28), vegetation removal is not subject to this restriction. Although the proposed action is not an AZDOT project, the referenced guidelines would be applicable to other projects within the State of Arizona. The Pascua-Yaqui Tribe has committed to contracting a qualified biologist to conduct a survey for active migratory bird nests where vegetation would be destroyed, removed, or trimmed during the migratory bird breeding season (March 1 – August 31). Further, should migratory bird nests be established on the tower structures or associated facilities following construction, the owner of the facilities will consult with the USFWS to ensure that all on-site activities are in compliance with the Migratory Bird Treaty Act.

Considering the proposed measures, the project is not anticipated to adversely affect migratory birds.

5.6 Historic and Cultural Resources

The Arizona State Historic Preservation Office (AZ SHPO) was provided with a Class III Cultural Resources Survey Report Summary Form (SRSF) for the Coolidge site since the undertaking would be located on privately owned land. Although the remaining Proposed Action sites are located on lands owned by the Pascua Yaqui Tribe, the AZ SHPO was also provided with a Class III Cultural Resources SRSF for the Guadalupe and Marana sites and a full Class III Cultural Resources Survey Report for the Milagros site, per the direct request of the Pascua Yaqui Tribal Historic Preservation Office (PY THPO). The Old Pascua site is located on property that is currently being converted from Pascua Yaqui Tribe fee lands to Trust lands. Therefore, at the request of the Pascua Yaqui Tribe, a Class III Cultural Resources Survey Report was submitted to the PY THPO.

On behalf of the NTIA, a no adverse effect determination was made for each of the tower sites. Documentation of AZ SHPO and PY THPO consultation is included in Appendix F. SHPO and THPO concurrences with these determinations are provided in Table 5-2.

Table 5-2: Historic and Cultural Resources Identified with Project APEs

Site	Finding (AZ SHPO/PY THPO)	SHPO/THPO Response Date
Coolidge	No Adverse Effect	August 22, 2023 (AZ SHPO) and September 15, 2023 (PY THPO)
Guadalupe	No Adverse Effect	August 25, 2023 (AZ SHPO) and September 15, 2023 (PY THPO)
Marana	No Adverse Effect	August 25, 2023 (AZ SHPO) and September 15, 2023 (PY THPO)
Milagros	No Adverse Effect *AZ SHPO and PY THPO have determined that the PY THPO office must be present to monitor all ground disturbance for the construction of the tower on PYT-owned land	October 23, 2023 (AZ SHPO) and September 15, 2023 (PY THPO)
Old Pascua	No Adverse Effect *PY THPO has determined that should any ground disturbance occur within the City of Tucson right-of-way, a City of Tucson approved archaeological monitor must be present.	September 15, 2023 (PY THPO)

Between 17 and 19 federally recognized tribes were identified that may attach religious and cultural significance to Historic Properties within the areas of each proposed undertaking. All Native American Tribes that have expressed interest within this area have either concurred with the project or expressed no further interest. Non-responsive tribes for Milagros, Marana, Old Pascua, and Guadalupe were not escalated as those projects are located on lands owned or held in trust for the Pascua Yaqui Tribe and the THPO has made No Adverse Effect determinations. Documentation of THPO consultation is included in Appendix F. Aside from the stipulations addressed in Table 5-1, no additional archaeological monitoring is required.

No Action Alternative would result in no construction activities at the Proposed Action sites and therefore would have no impact to historic and cultural resources.

5.7 Aesthetic and Visual Resources

The Proposed Action would include the installation of antennas on existing structures and three proposed 75-foot tall monopole telecommunications towers. While residential development is located within the vicinity of the Proposed Action sites, impacts to any aesthetic or visual resources would be minimal, since the Guadalupe and Old Pascua sites would involve installation activities on existing structures and the remaining proposed towers would, at 75 feet in height, have a similar impact as other infrastructure (i.e. power lines and utility/light poles) that already exists in the viewshed of the of the Proposed Action sites.

A No Action Alternative would result in no construction activities or new additions to the landscape at the Proposed Action sites and therefore would have no impact to aesthetic and visual resources.

5.8 Land Use

The Proposed Action would result in no changes in the land use at the Guadalupe and Old Pascua sites. The overall land use for the larger tracts on which the remaining three proposed tower sites (Coolidge, Marana, and Milagros) would also remain the same, and the Proposed Action would result in no changes to surrounding property land uses.

A No Action Alternative would result in no construction activities at the Proposed Action sites and therefore would have no impact to land uses.

5.9 Infrastructure

The Proposed Action would require additional energy demands for each of the wireless facilities, including a temporary increase during construction and installation activities. However, the overall increase in energy demand for the Proposed Action would be within the existing capabilities of local electrical distribution providers during construction and implementation as well as for continued operation of the wireless facilities. No new public roadways would be required for the construction of the Proposed Action, and since the Proposed Action involves unmanned wireless facilities, no water and sewer infrastructure would be required. While minimal impacts to local traffic would potentially occur during the staging and construction portions of the Proposed Action (particularly for the Marana and Milagros site, which are located immediately adjacent to public roads), there would be no long term impacts to traffic as a result of the operation of Proposed Action.

A No Action Alternative would result in no construction activities at the Proposed Action sites and therefore would have no impact to infrastructure.

5.10 Socioeconomic Resources

The enhanced capabilities and reliability of voice and data communications resulting from the Proposed Action would provide additional economic and educational opportunities and access to previously inaccessible telehealth care services for the Pascua Yaqui Tribe and surrounding communities. This would not only provide a more equitable distribution of these vital services but also increase the sense of security and wellbeing among these communities.

A No Action Alternative would result in no construction activities at the Proposed Action sites and would therefore negatively impact the Pascua Yaqui Tribe and surrounding communities, who would continue to lack access to modern communications capabilities and therefore continue to experience the negative ramifications resulting from a digital divide, further marginalizing members of the Pascua Yaqui Tribe and surrounding communities that would benefit the most from the Proposed Action.

5.11 Human Health and Safety

The Proposed Action would not require the handling or use of any hazardous materials. During construction, Occupational Safety and Health Administration (OSHA) safety standards would be enforced for contractors and their employees. Further, the Proposed Action would result in improved access to healthcare services for the Pascua Yaqui Tribe and surrounding community members.

A No Action Alternative would result in no construction activities at the Proposed Action sites and therefore negatively impact the Pascua Yaqui Tribe and surrounding communities, who would continue to have diminished access to healthcare services.

5.12 Cumulative Impacts

Cumulative impacts are the incremental impacts on the environment from the Proposed Action, in addition to the environmental impacts from other past, present, and reasonably foreseeable future (i.e., 20 years) actions. Cumulative impacts can result from individually insignificant but collectively significant actions taking place over a period of time for a particular resource type or area of concern.

The Proposed Action is comprised of the collocation of antennas on an existing building and tower structure and three proposed 75-foot tall towers that would be constructed within compounds of less than 0.1-acres in size. The Proposed Action is part of a larger initiative also being funded by a grant from the NTIA to improve communications infrastructure that, while functionally separate, also includes the installation of aerial and underground (via direct boring or via existing conduits) fiber that would service the Pascua Yaqui Tribe community.

Any impacts to the environment from the Proposed Action and associated actions, when combined with other past, present, or potential future actions, would be minimal. Further, the minimal negative impacts to the environment from the Proposed Action and associated actions would be greatly outweighed by the benefit to quality of life for the populations surrounding the proposed project areas. There are therefore no foreseeable cumulative effects that would result from the Proposed Action.

6.0 Applicable Environmental Permits and Regulatory Requirements

Table 6-1: Potential Applicable Statutory, Regulatory, and Other Requirements

Potentially Applicable Requirement	Relevant Project Information
All Resources	
National Environmental Policy Act (NEPA) of 1969 42 U.S.C. § 4321 et seq.	<i>NEPA requires all federal agencies to assess environmental effects of their proposed actions; this Environmental Assessment fulfills that requirement.</i>
Vegetation, Wildlife, and Fish	
Endangered Species Act of 1973 16 U.S.C. § 1531 et seq.	<i>Sections 7(a)(1) and 7(a)(2) of the Endangered Species Act requires federal agencies to aid in the conservation of listed species and ensure activities are not likely to jeopardize the continued existence of federally listed species or destroy or adversely modify designated critical habitat; a No Effect determination has been made for protected species and no critical habitat is located within the Proposed Action vicinity.</i>
Waters, Wetlands, and Floodplain Protection	
Clean Water Act 33 U.S.C. § 1251 et seq.	<i>The Clean Water Act prohibits the discharge of any pollutant from a point source into navigable waters; no surface waters have been identified within or near the Proposed Action sites.</i>
Floodplain Management Executive Order 11988	<i>Executive Order 11988 requires federal activities to avoid adverse impacts to wetlands where practicable, and Executive Order 11990 requires federal activities to elevate structures located within floodplains above the base flood level where practicable; no wetlands or floodplains have been identified within or near the Proposed Action sites.</i>
Protection of Wetlands Executive Order 11990	
Cultural and Historic Resources	
National Historic Preservation Act (NHPA), as amended, inclusive of Section 106 54 U.S.C. § 306108 et seq.	<i>Section 106 NHPA requires federal agencies to identify and assess the effects its actions may have on historic properties; the Section 106 review process has revealed no adverse effects on historic properties as a result of the Proposed Action.</i>
Noise, Public Health, and Safety	
Federal Communications Commission (FCC)	<i>47 CFR 1.1310 provides radiofrequency radiation exposure limits from FCC; the Proposed Action would comply with the criteria set forth in 47 CFR 1.1310.</i>

7.0 Consultations

Table 7-1: Agency Consultations

Agency and Name	Consultation	Status
Arizona State Historic Preservation Office – Kathryn Leonard (602) 542-4009	Section 106 Historic Preservation Consultation	Complete: SHPO responses received 08/22/2023, 08/25/2023, and 10/23/2023
Pueblo of Zuni Tribal Historic Preservation Office – Cindy and Kirt Dongoske (505) 782-4814	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt for Coolidge = 9/13/2023 and cleared via Escalation on 9/28/2023; Guadalupe, Marana, Milagros, and Old Pascua= N/A
Apache Tribe of Oklahoma Tribal Historic Preservation Office – Darrin Cisco (405) 247-7494 (x. 103)	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt for Coolidge = 9/13/2023 and cleared via Escalation on 9/28/2023; Guadalupe, Marana, Milagros, and Old Pascua= N/A
Eastern Shoshone Tribe Tribal Historic Preservation Office – Josh Mann (307) 335-2081	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt for Coolidge = 9/14/2023 and cleared via Escalation on 9/29/2023; Guadalupe, Marana, Milagros, and Old Pascua= N/A
Cocopah Indian Tribe Tribal Historic Preservation Office – Justin Brundin and Sherry Cordova (928) 627-4849	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt for Coolidge and Guadalupe = N/A; Marana, Milagros, and Old Pascua= No follow-up contact was attempted per NTIA instruction.
Tohono O'odham Nation Tribal Historic Preservation Office – Peter Steere (520) 383-0202	Section 106 Historic Preservation Consultation	Complete: THPO responses received 8/4/2023 <i>*Milagros: Mr. Steere recommended that there be a cultural monitor on site during all ground disturbance at Milagros and that the proposed fiber conduit be excavated with a backhoe instead of a trencher.</i>
Ak Chin Indian Community Council Tribal Historic Preservation Office – Carmen E Narcia (520) 568-1365	Section 106 Historic Preservation Consultation	Complete: THPO responses received 8/30/2023
Pascua Yaqui Tribe Tribal Historic Preservation Office – Karl Hoerig (520) 883-5116	Section 106 Historic Preservation Consultation	Complete: THPO responses received 9/15/2023 <i>*Milagros: Dr. Hoerig has stated that all initial ground disturbance for Milagros must be monitored by a qualified archaeologist. He stated that PYTHPO will provide monitoring work for any ground disturbance located on the Tribe's fee lands, and that a City of Tucson-approved archaeological monitor be present for disturbance occurring within the City of Tucson ROW. He will also require that the excavation for the fiber route be completed with a backhoe rather than a trencher.</i>

Agency and Name	Consultation	Status
		*Old Pascua: Dr. Hoerig has stated that the construction contractors must take care to avoid any ground disturbance or other activities that would adversely affect the historic Antonio Matus House (including any changes to precipitation runoff patterns that would increase moisture near the house) and no trenching should be undertaken adjacent to the historic house. If any ground disturbance will occur within the City of Tucson ROW, a City of Tucson-approved archaeological monitor be present. Lastly, should any cultural material be encountered, all work must cease within 15 meters and the PYTHPO be contacted.
Tonto Apache Tribal Council Tribal Historic Preservation Office – Jeri DeCola (928) 474-5000	Section 106 Historic Preservation Consultation	Complete: THPO did not respond; however, they have a 30-day response agreement listed in their contact preferences in TCNS
Kaibab Band of Paiute Indians Tribal Historic Preservation Office – Daniel Bullets (928) 643-7245	Section 106 Historic Preservation Consultation	Complete: THPO did not respond; however, they have a 30-day response agreement listed in their contact preferences in TCNS
San Juan Southern Paiute Tribe Tribal Historic Preservation Office – Keenan Barlow (928) 707-5075	Section 106 Historic Preservation Consultation	Complete: THPO did not respond; however, they have a 30-day response agreement listed in their contact preferences in TCNS
Skull Valley Band of Goshute Tribal Historic Preservation Office – Candace Bear (435) 882-4532	Section 106 Historic Preservation Consultation	Complete: THPO did not respond; however, they have a 30-day response agreement listed in their contact preferences in TCNS
Mescalero Apache Tribe Tribal Historic Preservation Office – Holly B. Houghten (575) 464-3005	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt for Coolidge = 9/13/2023 and cleared via Escalation on 9/28/2023; Guadalupe, Marana, Milagros, and Old Pascua= N/A
White Mountain Apache Tribe Tribal Historic Preservation Office – Mark Altaha (928) 338-3033	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt for Coolidge = 9/13/2023 and cleared via Escalation on 9/28/2023; Guadalupe, Marana, Milagros, and Old Pascua= N/A
Hopi Cultural Preservation Office – Stewart Koyiyumtewa (928) 734-3619	Section 106 Historic Preservation Consultation	Complete: THPO responses received 8/14/2023
Yavapai-Apache Community Council Tribal Historic Preservation Office – Christopher M. Coder (928) 567-7026	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt for Coolidge = 9/13/2023 and cleared via Escalation on 9/28/2023; Guadalupe, Marana, Milagros, and Old Pascua= N/A
Gila River Indian Community Tribal Historic Preservation Office – Larry Benallie Jr. (520) 562-7162	Section 106 Historic Preservation Consultation	Complete: THPO responses received 8/7/2023

Agency and Name	Consultation	Status
Salt River Pima-Maricopa Indian Community Tribal Historic Preservation Office – Angela D. Garcia-Lewis (480) 362-6337	Section 106 Historic Preservation Consultation	Complete: Final follow-up attempt for Coolidge = 9/13/2023 and cleared via Escalation on 9/28/2023; Guadalupe, Marana, Milagros, and Old Pascua= N/A
Fort McDowell Yavapai Tribe Tribal Historic Preservation Office – Gary L. Loutzenheiser (480) 789-7000	Section 106 Historic Preservation Consultation	Complete: THPO did not respond; however, they have a 30-day response agreement listed in their contact preferences in TCNS
Yavapai-Prescott Indian Tribe Tribal Historic Preservation Office – Greg Gassco (928) 777-9435	Section 106 Historic Preservation Consultation	Complete: THPO did not respond; however, they have a 30-day response agreement listed in their contact preferences in TCNS
Fort Mojave Indian Tribe Tribal Historic Preservation Office – Linda Otero (928) 768-4475	Section 106 Historic Preservation Consultation	Complete: Guadalupe= No follow-up contact was attempted per NTIA instruction; Coolidge, Marana, Milagros, and Old Pascua= N/A

8.0 References

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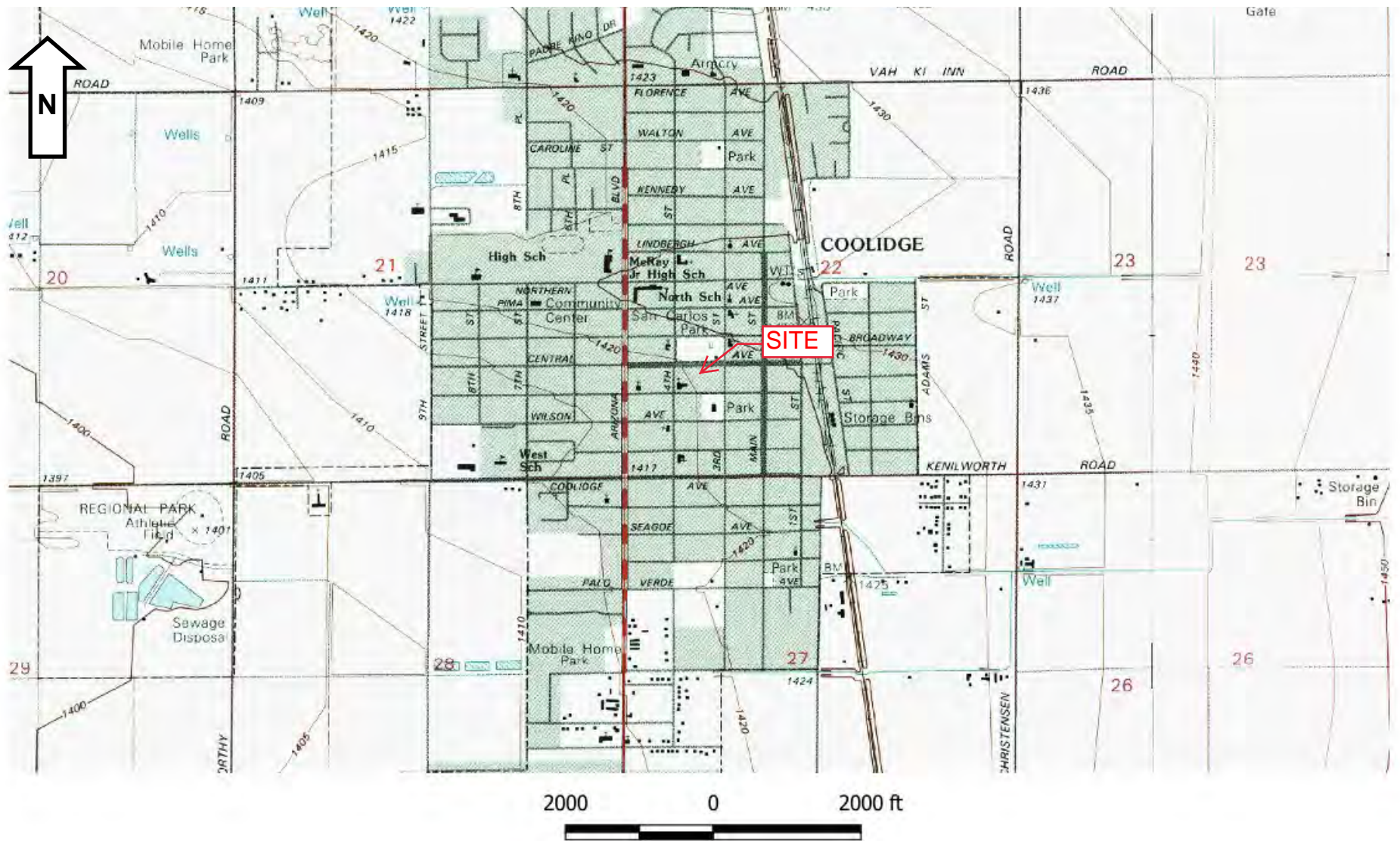
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U.S. Geological Survey. 7.5 Minute Topographic Quadrangle Map. *Marana, AZ* (1996).

U.S. Geological Survey. 7.5 Minute Topographic Quadrangle Map. *Tuscon, AZ* (1996).

Appendix A
Site Maps and Photographs

Topographic Maps

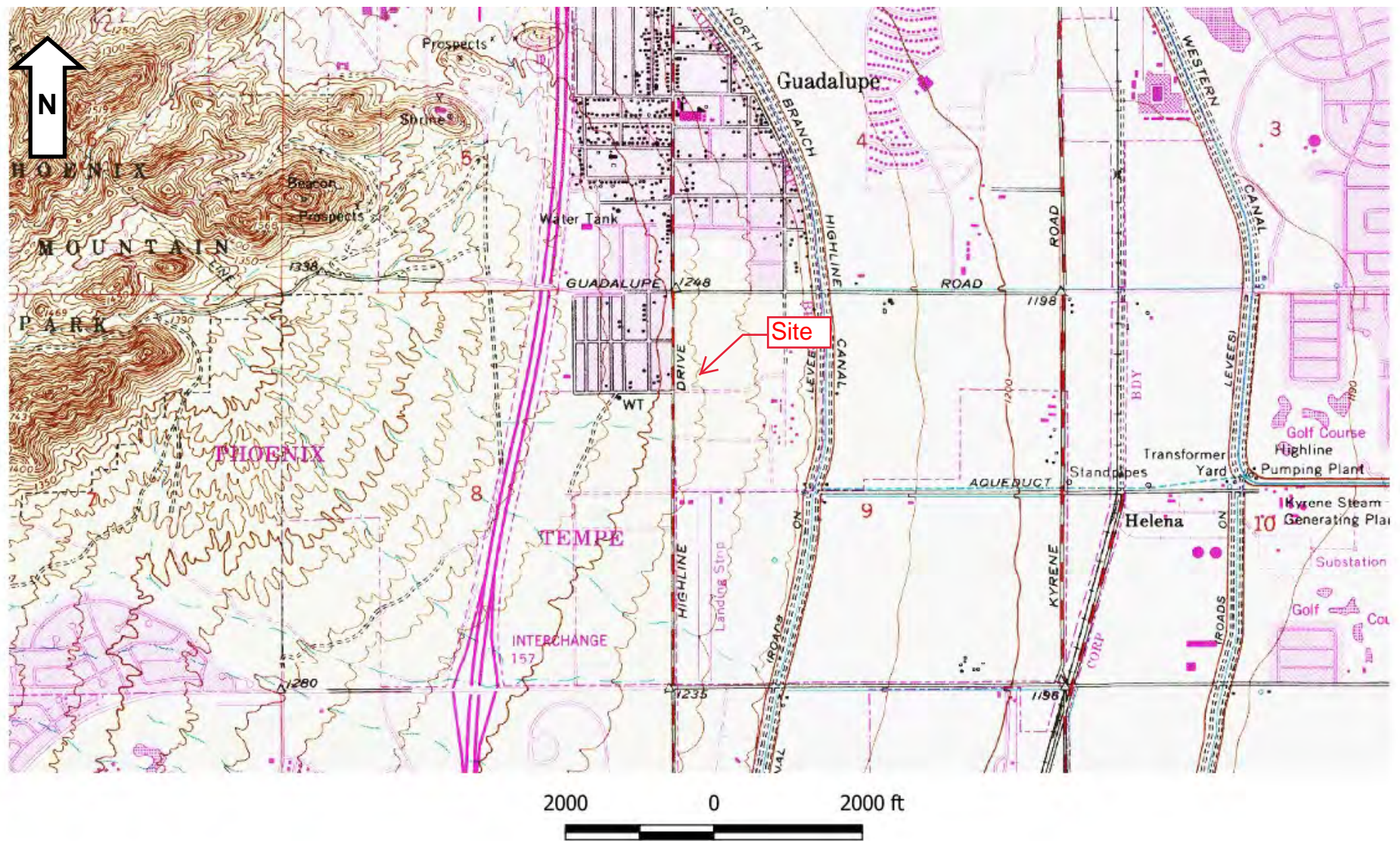


Source: USGS Topographic Map 7.5 Series, Coolidge, AZ (1966).

Coolidge Site Location Map

ECA ID: 23-001191



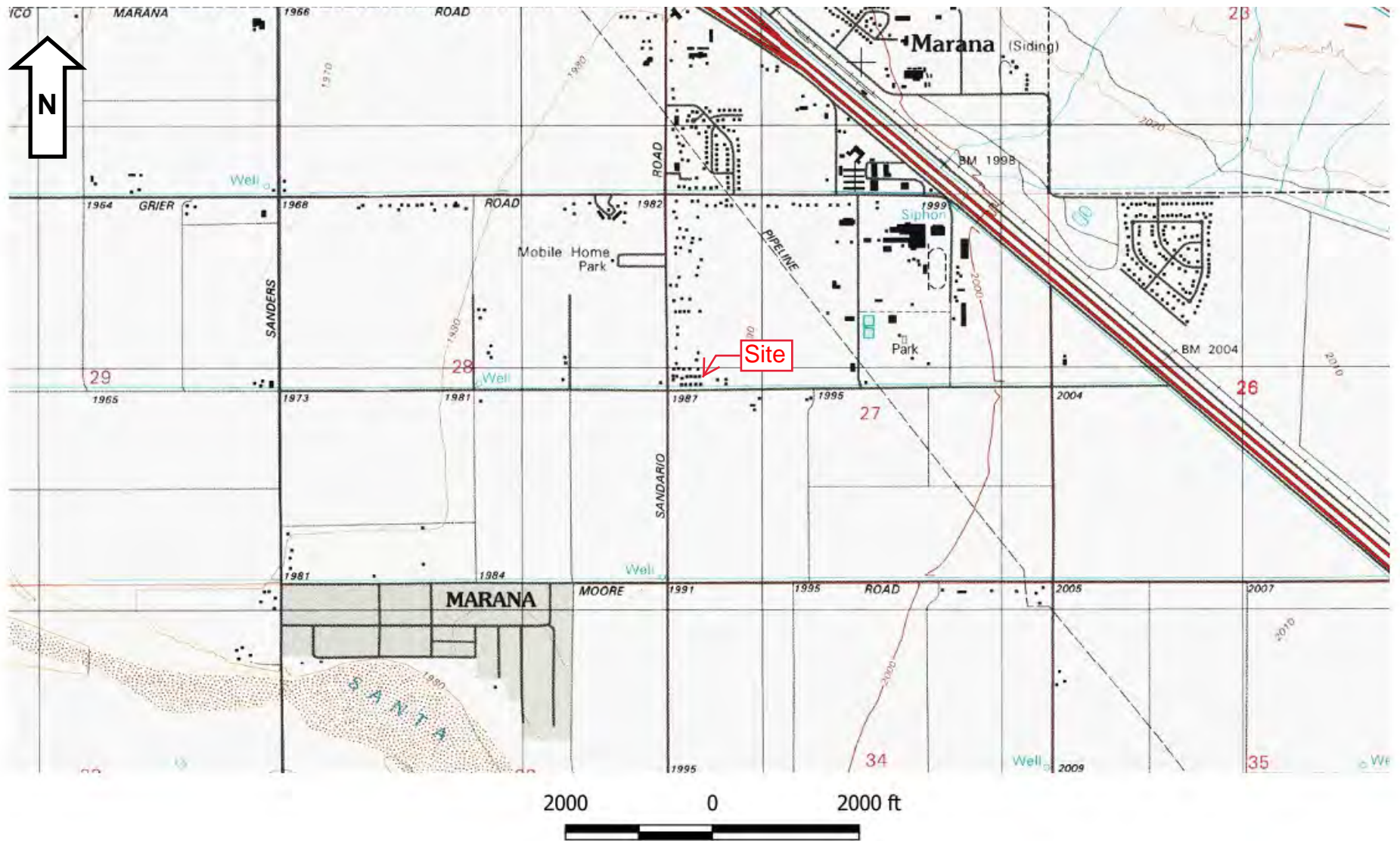


Source: USGS Topographic Map 7.5 Series, *Guadalupe, AZ* (1952, photorevised 1982).

Guadalupe Site Location Map

ECA ID: 23-001205



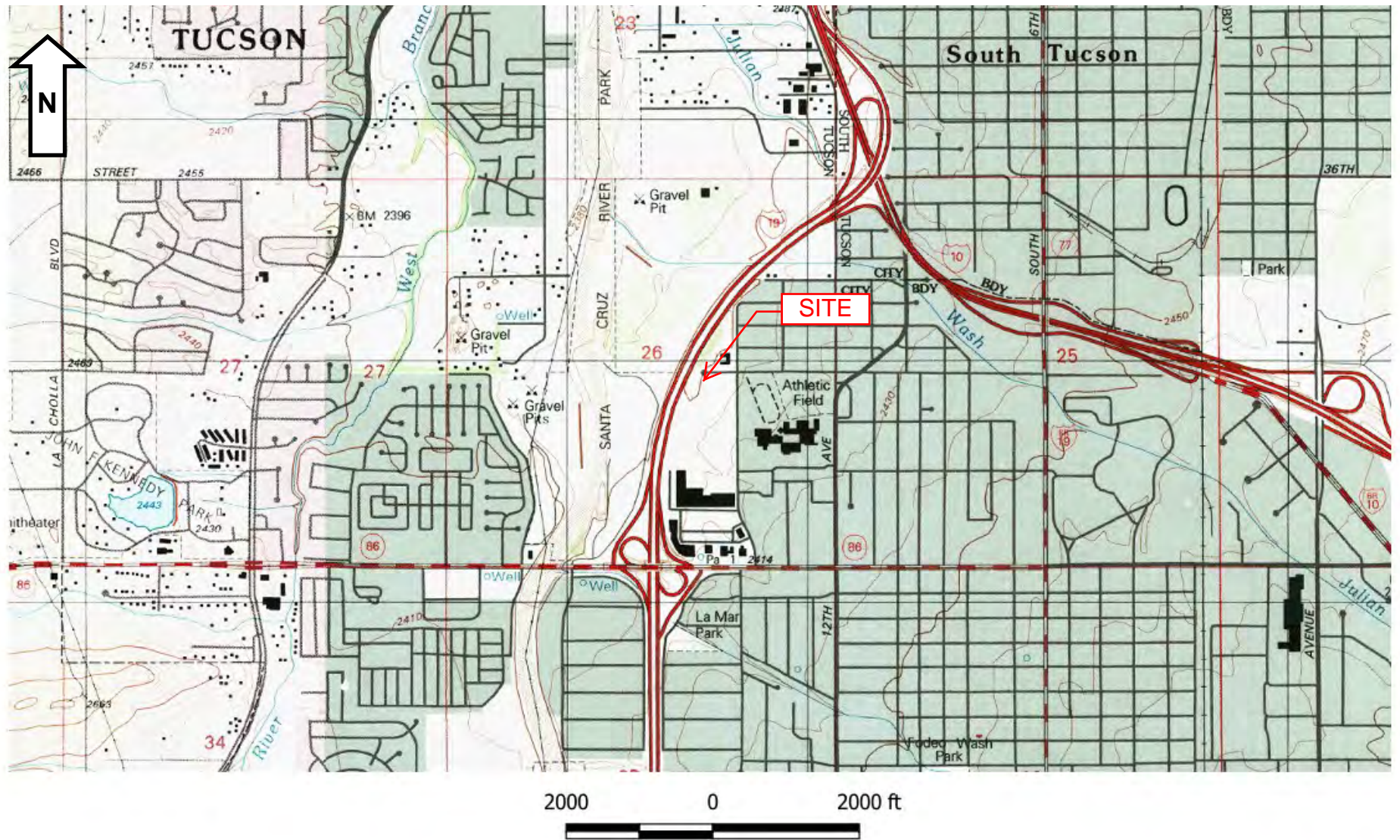


Source: USGS Topographic Map 7.5 Series, Marana, AZ (1996).

Marana Site Location Map

ECA ID: 23-001200





Source: USGS Topographic Map 7.5 Series, Tucson, AZ (1996).

Milagros Site Location Map

ECA ID: 23-001190

ECA



Source: USGS Topographic Map 7.5 Series, Tucson, AZ (1996).

Old Pascua Site Location Map

ECA ID: 23-001203



Aerial Photographs



Source: Google Earth 2020

Milagros Aerial Photograph

ECA ID: 23-001190

ECA



Source: Google Earth 2022

Coolidge Aerial Photograph

ECA ID: 23-001191





Source: Google Earth 2022

Marana Aerial Photograph

ECA ID: 23-001200

ECA



Source: Google Earth 2023

Old Pascua Aerial Photograph

ECA ID: 23-001203





Source: Google Earth 2022

Guadalupe Aerial Photograph

ECA ID: 23-001205

ECA

Site Plans & Photographs



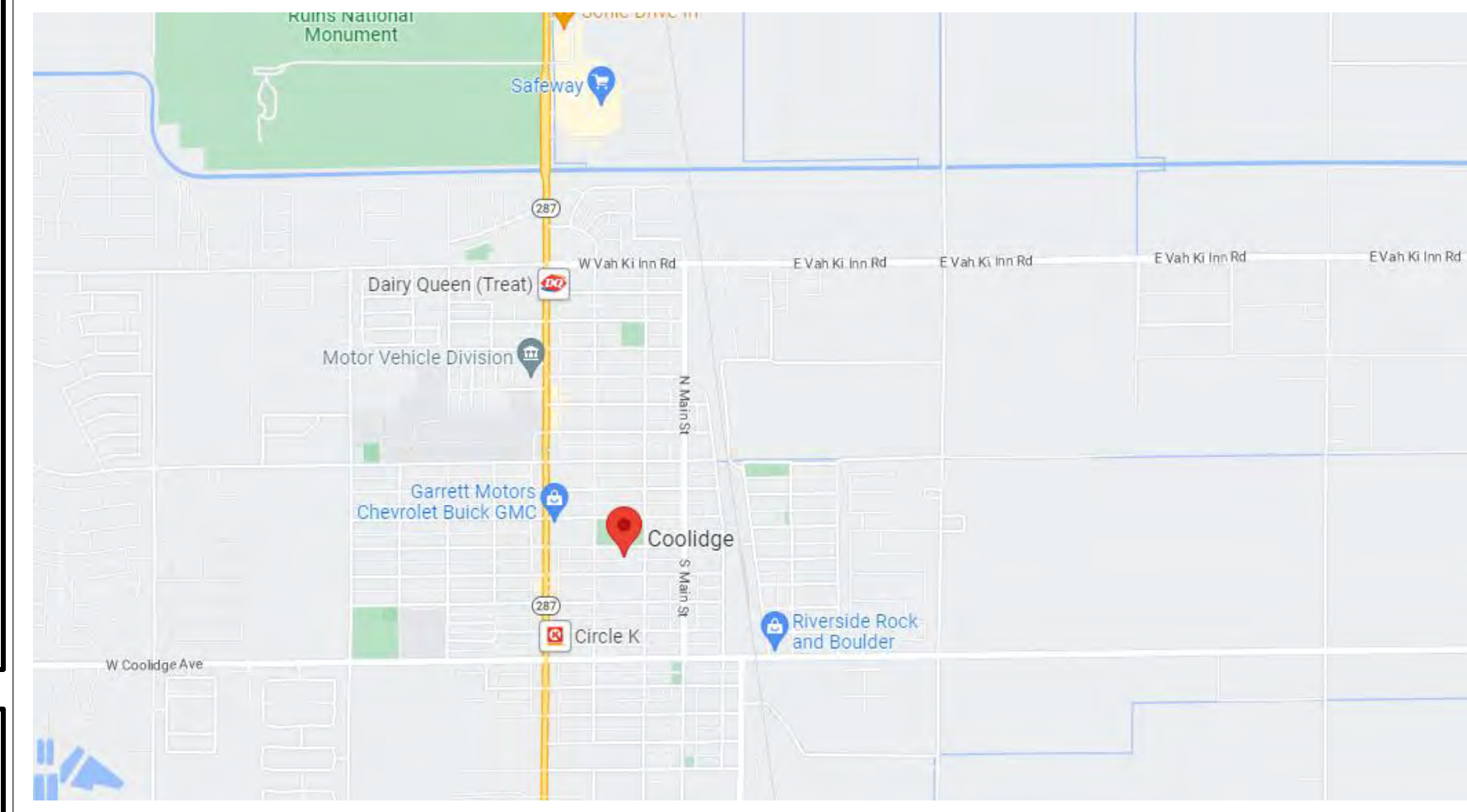
Coolidge Tower Site

Coolidge AZ

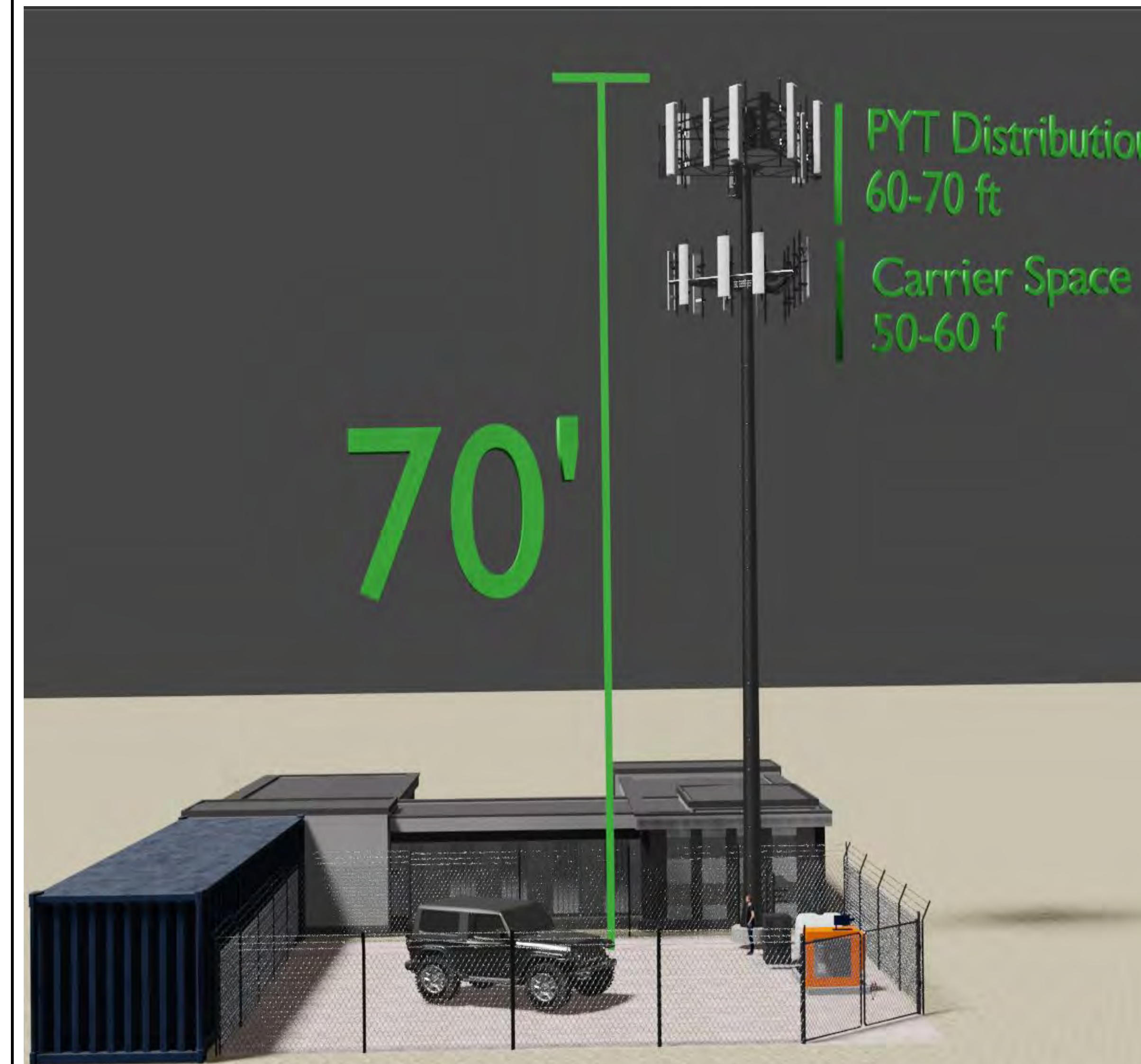
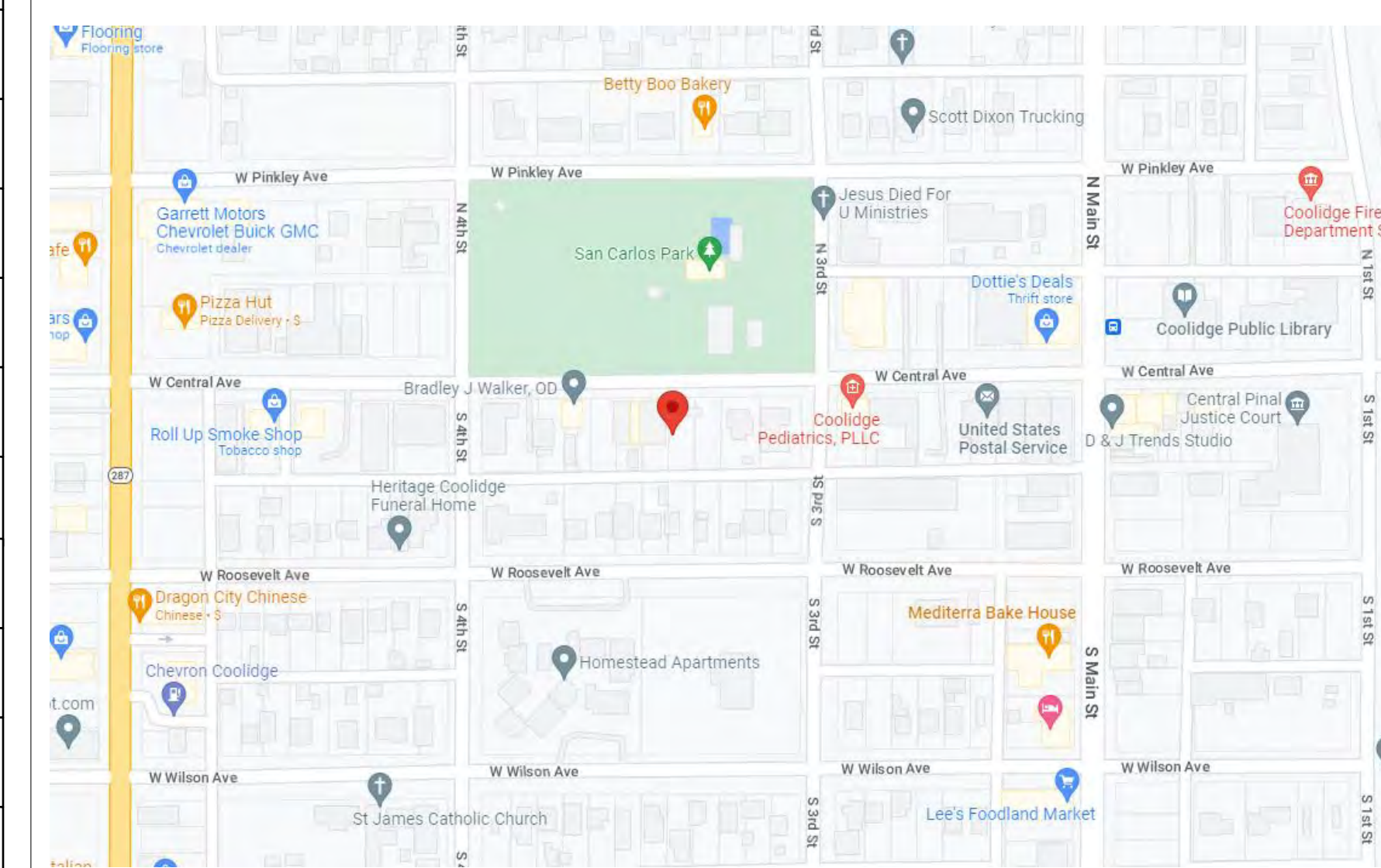
SITE INFORMATION

Asset Number:	
Asset Name:	Coolidge Site 1
Asset Class:	WIRELESS
Structure Type:	Monopole Tower
Structure Height:	70ft
Address:	341 W Central Ave
City:	Coolidge
County:	Pima
State:	Arizona
Zip:	85128
Latitude:	32°58'38.46"N (32.977350)
Longitude:	111°31'11.4"W (-111.520659)

LOCATION MAP



VICINITY MAP



PRELIMINARY

SUBMITTALS			
DATE	DESCRIPTION	REV	ISS. BY
2/16/23	FOR REVIEW	A	D.S.
2/16/23	FINAL	-	A.M.
-	-	-	-
-	-	-	-
-	-	-	-

DRAWN BY:	C.P.
CHECKED BY:	A.M.
APPROVED BY:	A.M.
NN PROJECT NO:	-

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Pascua Yaqui Tribe of Arizona
7474 S. Camino De Oeste
Tucson, AZ, 85746

PREPARED BY:



250 E. Penny Road, Suite 200
Wenatchee, WA 98801

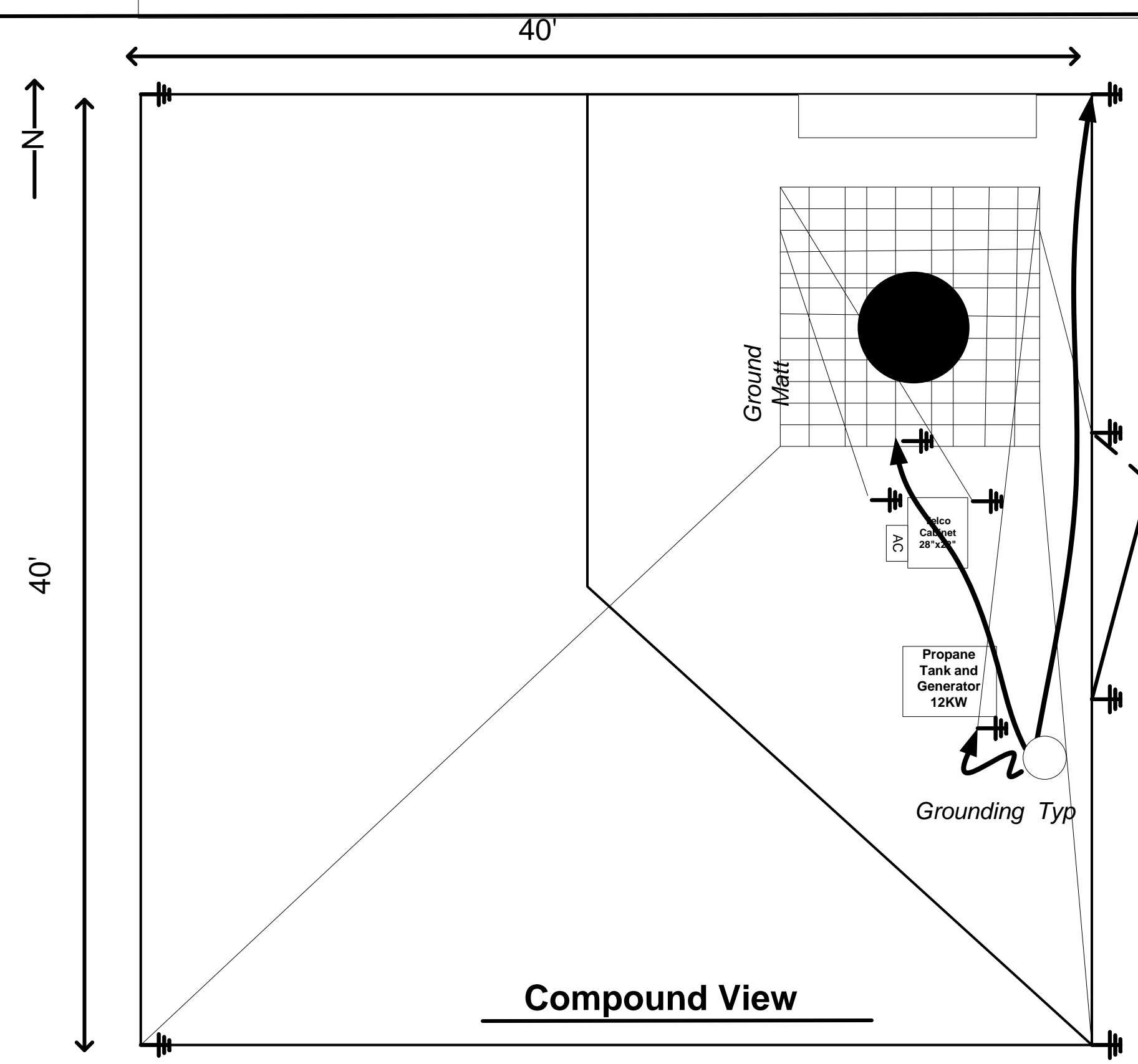
SITE NAME:
Coolidge Tower Site

SITE ADDRESS:
341 West Central Ave
Coolidge, AZ

SHEET TITLE:
TOWER SITE SUMMARY

SHEET NUMBER:
TSS-1

Aerial View



TOWER & SITE - 3D RENDERING



A: Northerly View from the Center of the Proposed Tower Compound Area



B: Easterly View from the Center of the Proposed Tower Compound Area



C: Southerly View from the Center of the Proposed Tower Compound Area



D: Westerly View from the Center of the Proposed Tower Compound Area

Coolidge Photographs

ECA ID: 23-001191





E: Southwesterly Overview of the Proposed Tower Compound



F: Northwesterly Overview of the Proposed Tower Compound



G: Easterly View of the Proposed Fiber Route



H: Westerly View of the Proposed Fiber Route



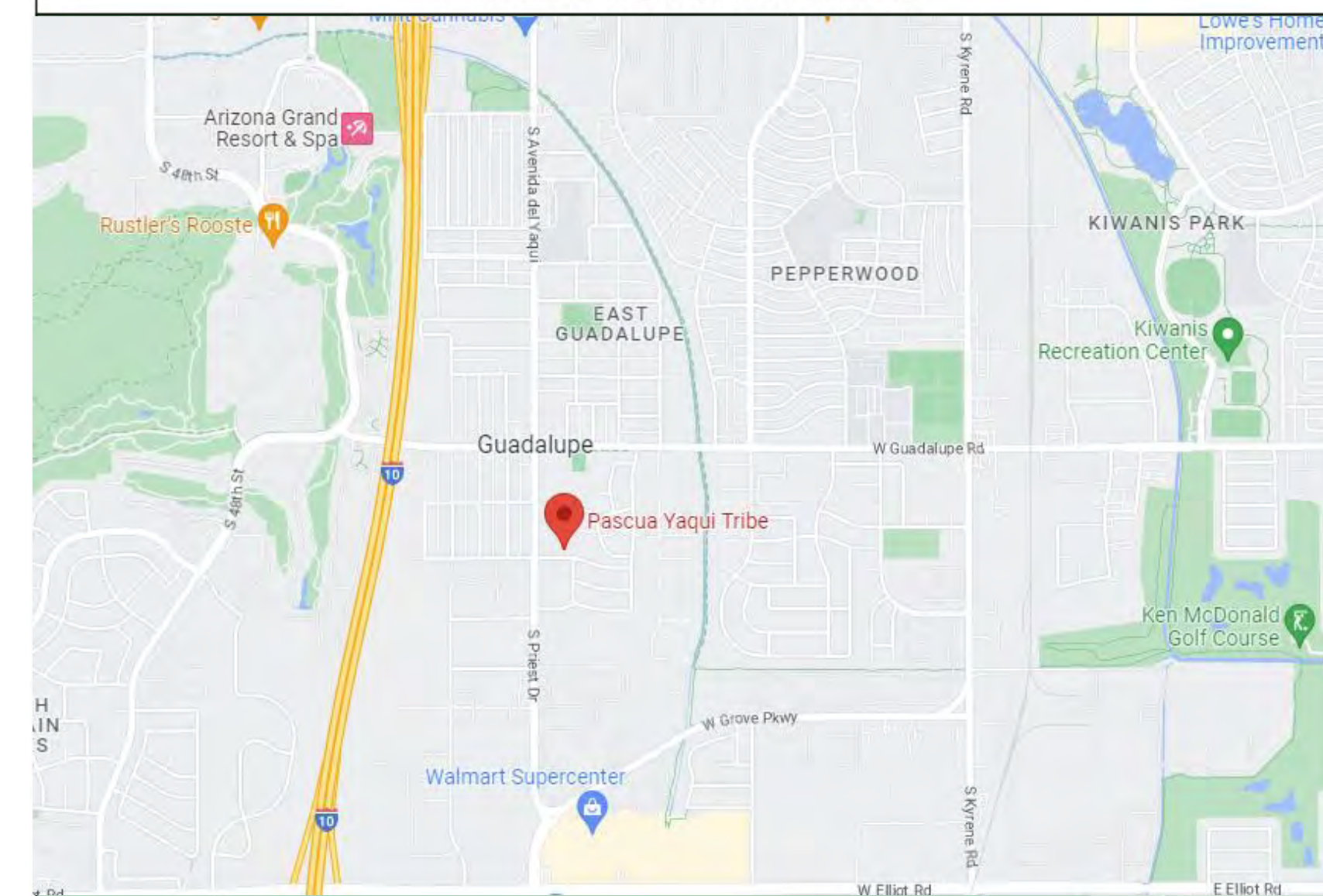
Guadalupe Tower

Guadalupe AZ

SITE INFORMATION

Asset Number:	
Asset Name:	Guadalupe Tower
Asset Class:	WIRELESS
Structure Type:	NON-PENETRATING ROOF MOUNT
Structure Height:	20FT ABOVE ROOF
Address:	9405 S Avenida Del Yaqui
City:	Guadalupe
County:	Maricopa
State:	Arizona
Zip:	85283
Latitude:	33° 21' 38.5" N (33.36070)
Longitude:	111° 57' 42.9" W (-111.96191)

LOCATION MAP

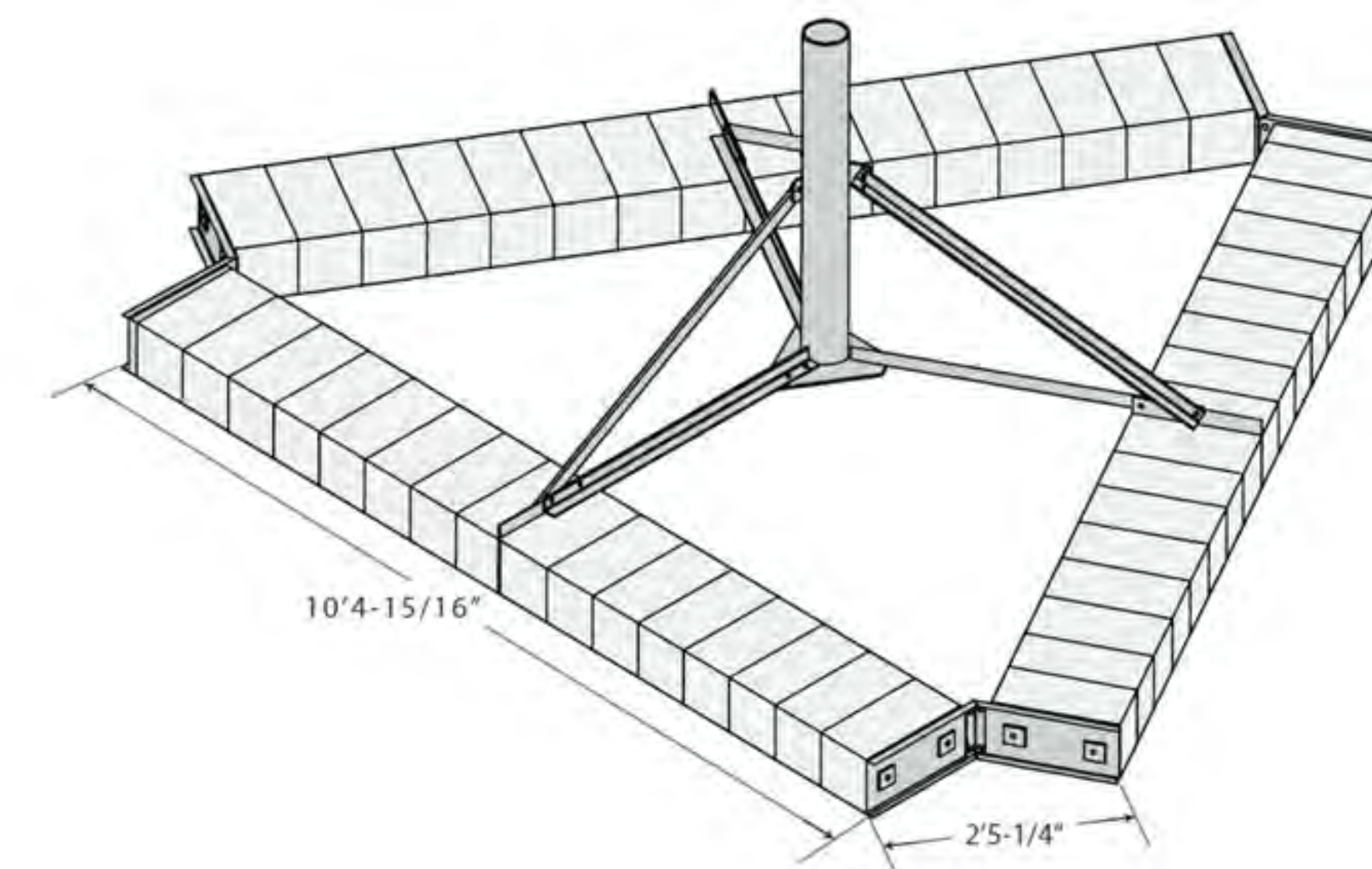
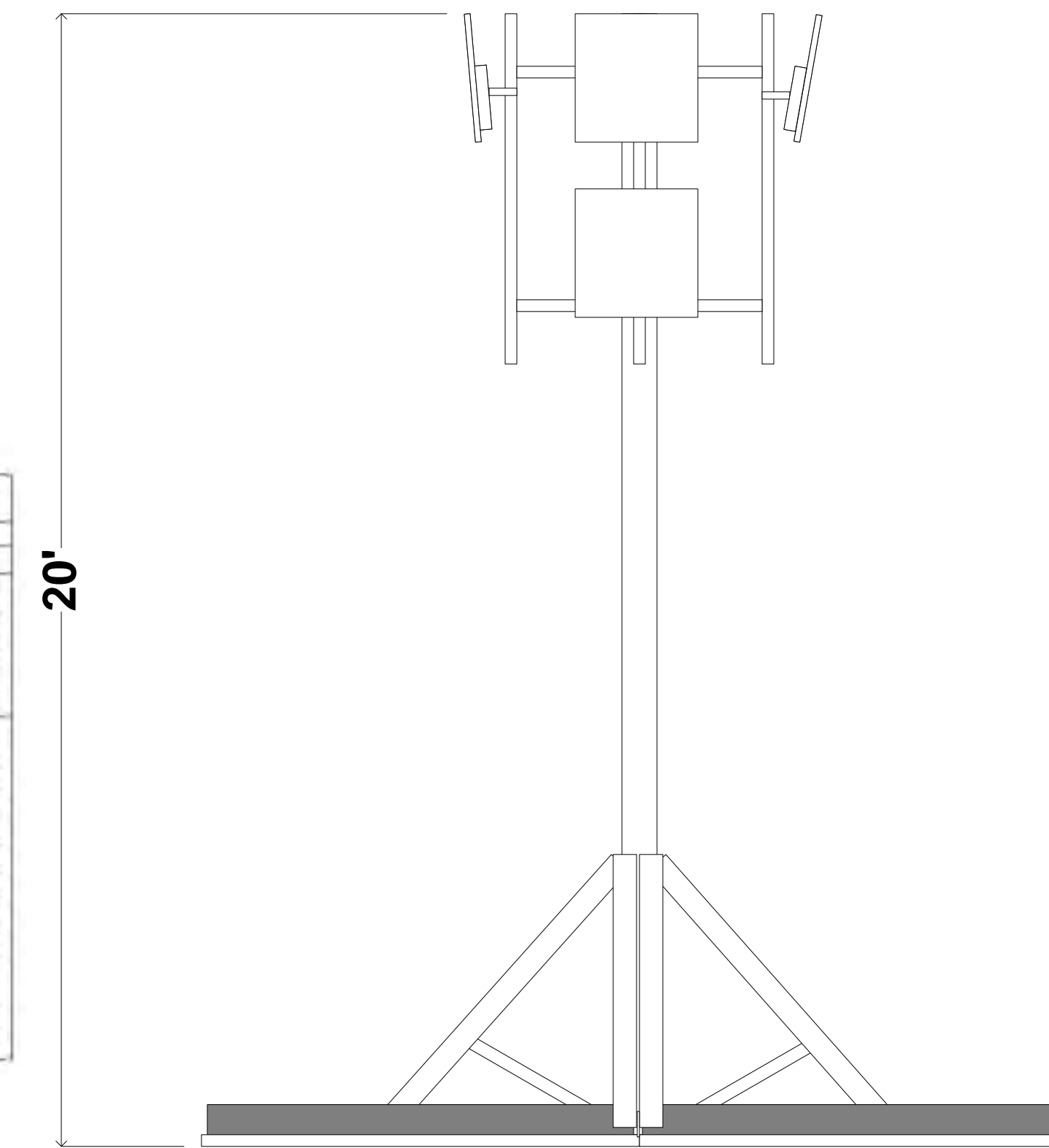


VICINITY MAP



ALLOWABLE ANTENNA AREAS

Antenna Diameter (FT.)	Ballast (LBS)	Zero Velocity Load (PSF)	Design Wind Velocities Coefficient of Friction = .50					
			EL=0°		EL=40°			
			Vmax	Vs	Vmax	Vs		
4 (1.2M)	1600	17.2	145	122	180	137	198	168
	1800	19.4	154	130	184	146	198	179
	2000	21.5	162	137	187	154	198	188
	2200	23.7	168	144	189	161	198	197
	2400	25.8	171	150	189	168	198	198
6 (1.8M)	1600	17.2	97	81	117	91	126	112
	1800	19.4	102	86	123	97	132	119
	2000	21.5	108	91	125	102	132	125
	2200	23.7	112	96	126	107	132	131
	2400	25.8	114	100	126	112	132	132
	2600	28.0	116	104	126	117	132	132
	2800	30.1	118	108	126	121	132	132
	3000	32.3	120	112	126	125	132	132
	3200	34.4	122	115	126	126	132	132
3400	36.6	124	119	126	126	132	132	
3600	38.7	125	122	126	126	132	132	
3800	40.9	125	125	126	126	132	132	



PRELIMINARY

SUBMITTALS

DATE	DESCRIPTION	REV	ISS. BY
2/16/23	FOR REVIEW	A	D.S.
2/16/23	FINAL	-	A.M.
-	-	-	-
-	-	-	-

DRAWN BY:	C.P.
CHECKED BY:	A.M.
APPROVED BY:	A.M.
NN PROJECT NO:	-

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PREPARED FOR:



Pascua Yaqui Tribe of Arizona
Tucson AZ

PREPARED BY:



250 E. Penny Road, Suite 200
Wenatchee, WA 98801

SITE NAME:

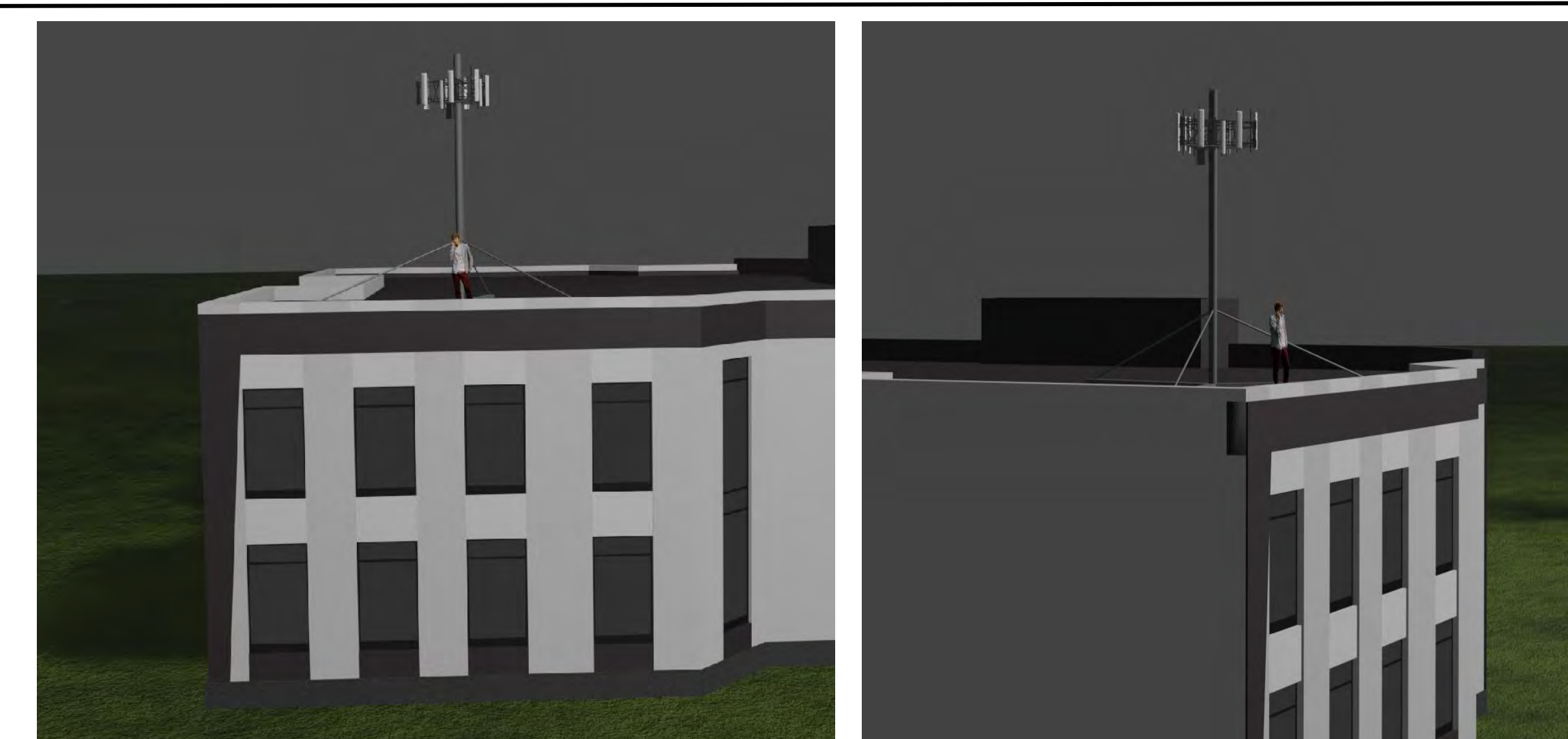
Guadalupe Tower

9405 S Avenida Del Yaqui
Guadalupe AZ 85283

SHEET TITLE:

SHEET NUMBER:

ENLARGED SITE PLAN



TOWER & SITE - 3D RENDERING



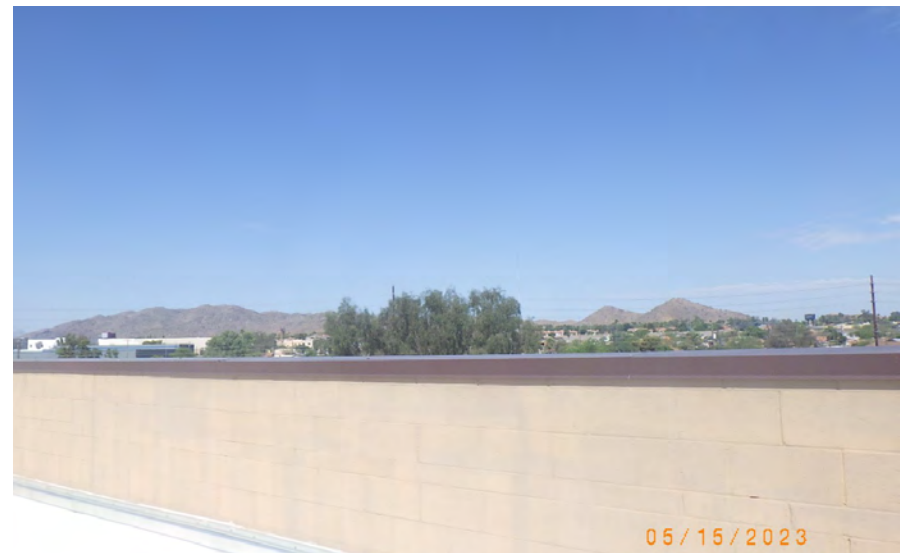
A: Northerly View from the Center of the Proposed Equipment Area



B: Easterly View from the Center of the Proposed Equipment Area



C: Southerly View from the Center of the Proposed Equipment Area



D: Westerly View from the Center of the Proposed Equipment Area

Guadalupe Photographs

ECA ID: 23-001205

ECA



E: Northwesterly Overview of the Rooftop



F: Westerly Overview of the Rooftop

Guadalupe Photographs

ECA ID: 23-001205

ECA



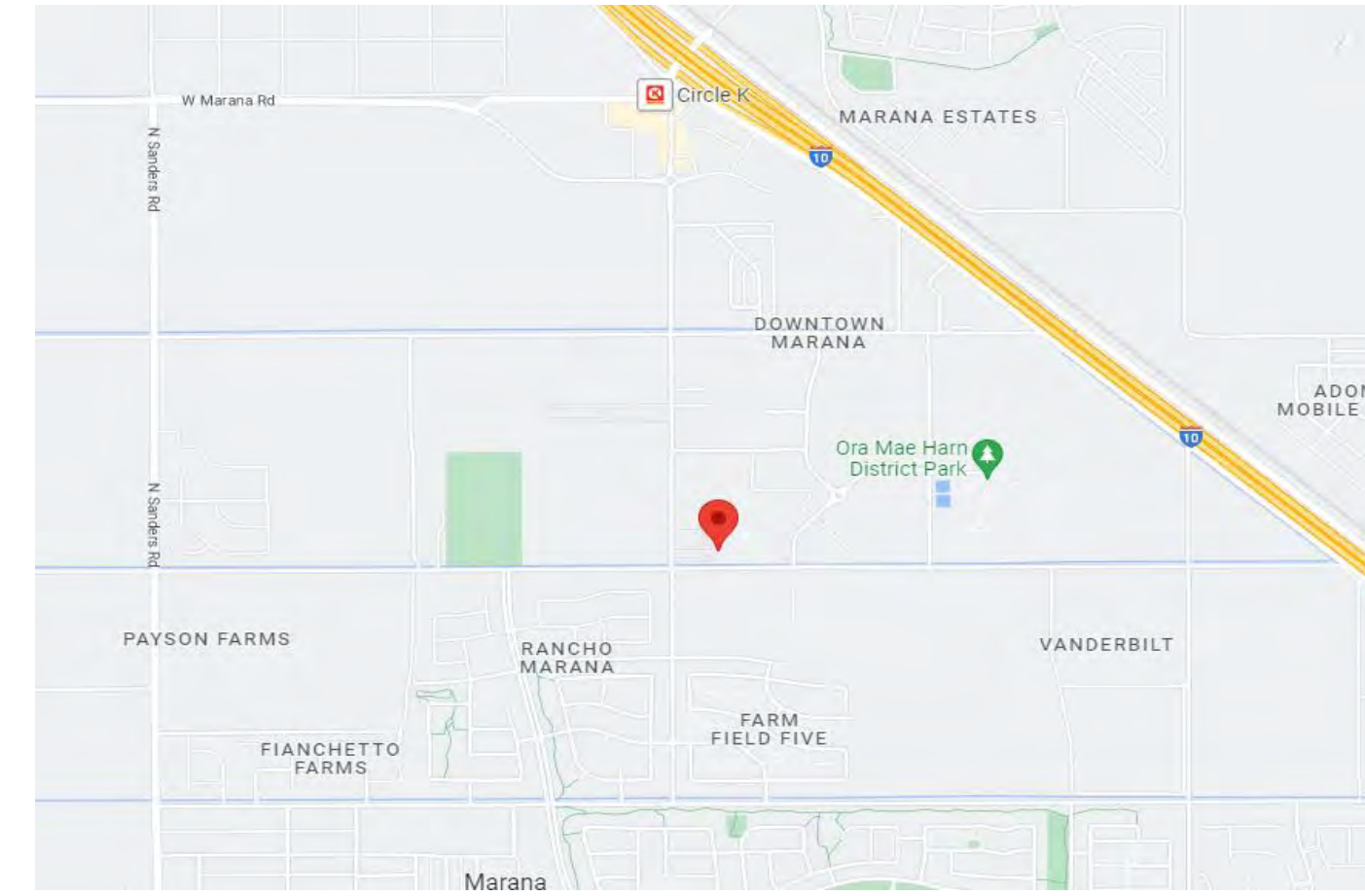
Marana Tower Site

Marana AZ

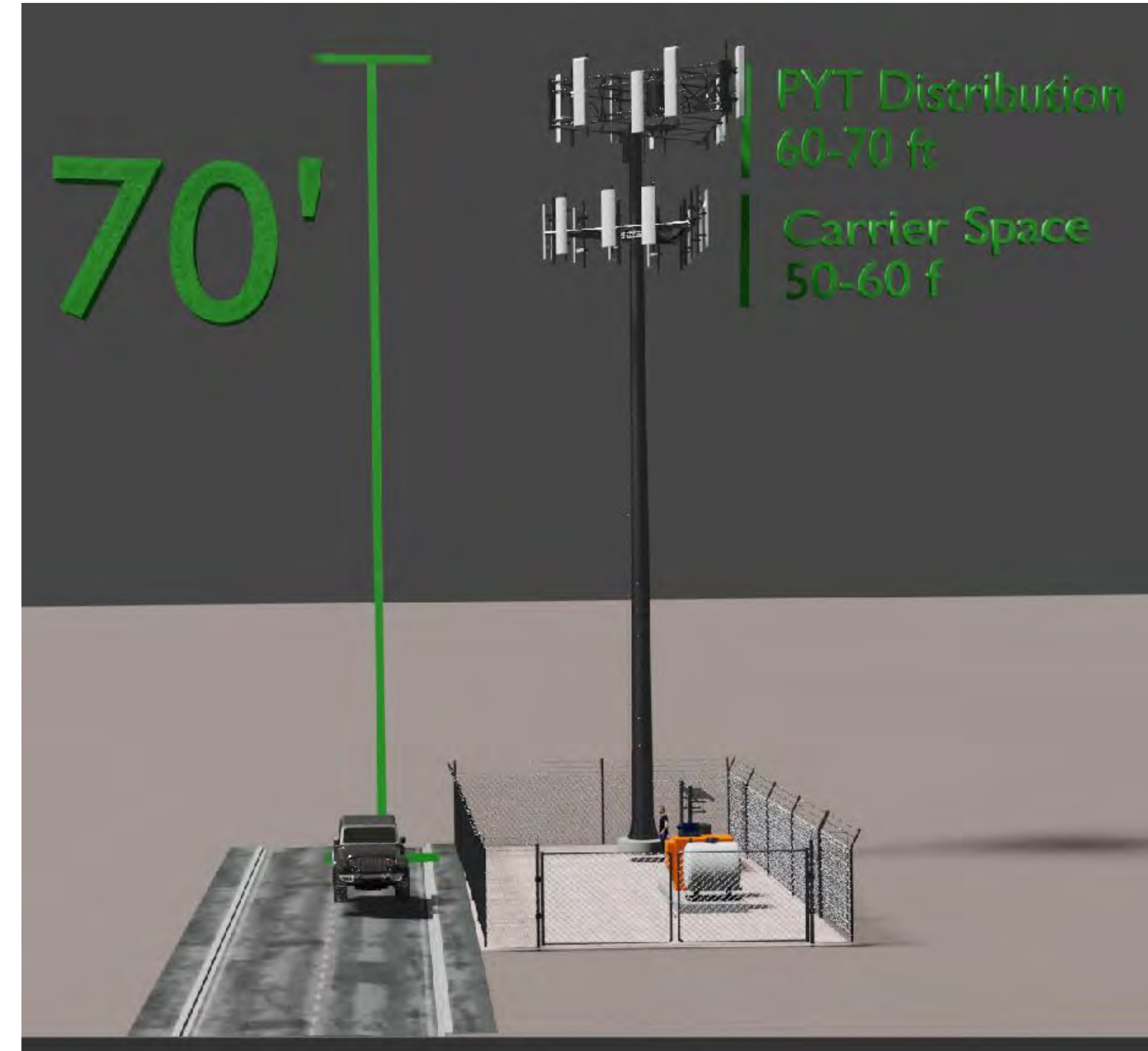
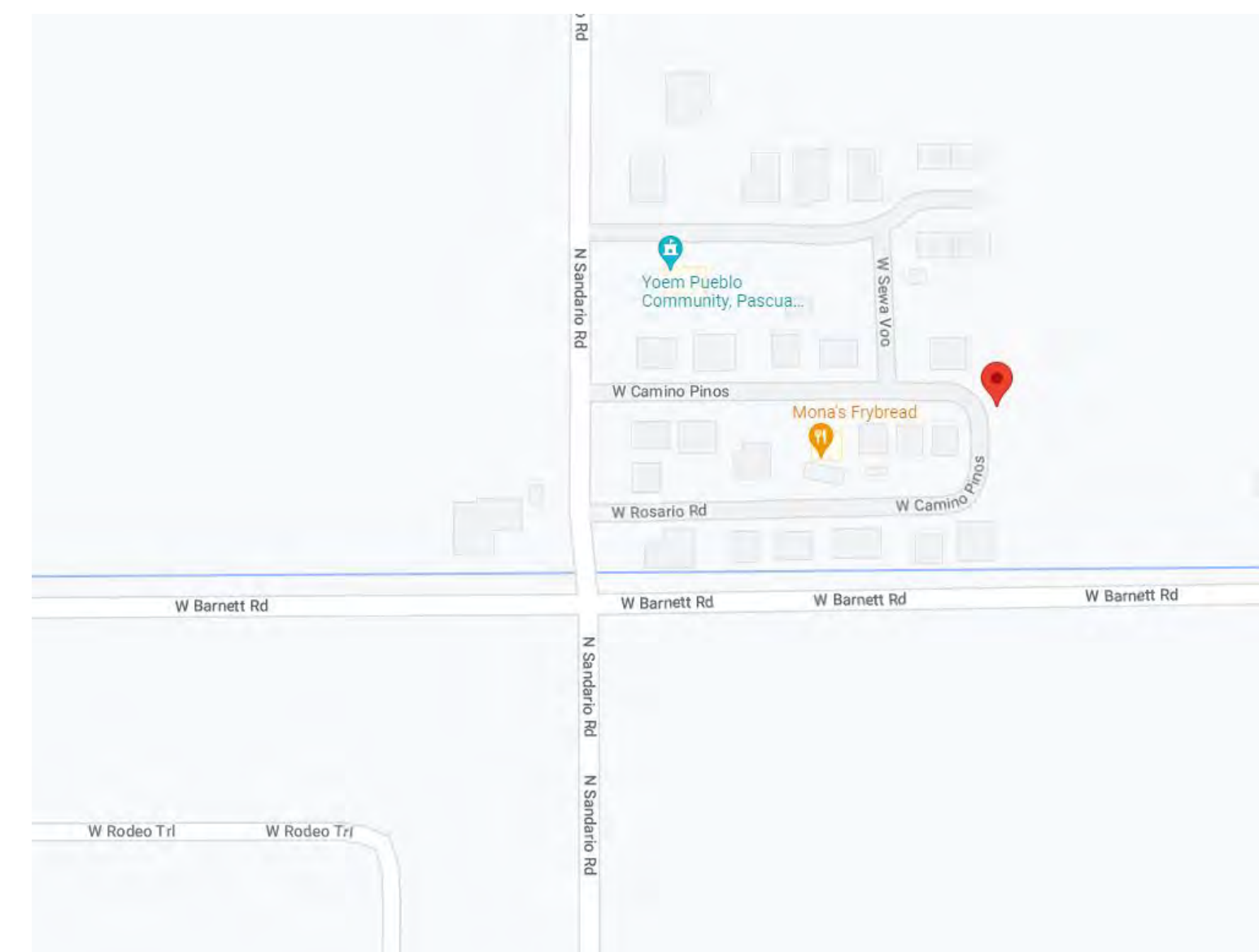
SITE INFORMATION

Asset Number:	
Asset Name:	Marana Tower Site
Asset Class:	WIRELESS
Structure Type:	Monopole Tower
Structure Height:	70ft
Address:	11720-11738 W Camino Pinos
City:	Marana
County:	Pima
State:	Arizona
Zip:	85653
Latitude:	32°26'48.2"N (32.446729)
Longitude:	111°12'55.6"W (-111.215437)

LOCATION MAP



VICINITY MAP



PRELIMINARY

SUBMITTALS			
DATE	DESCRIPTION	REV	ISS. BY
2/16/23	FOR REVIEW	A	D.S.
2/1/23	FINAL	-	A.M.
-	-	-	-
-	-	-	-
-	-	-	-

DRAWN BY:	C.P.
CHECKED BY:	A.M.
APPROVED BY:	A.M.
NN PROJECT NO:	-

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Pascua Yaqui Tribe of Arizona
7474 S. Camino De Oeste
Tucson, AZ, 85746

PREPARED BY:



250 E. Penny Road, Suite 200
Wenatchee, WA 98801

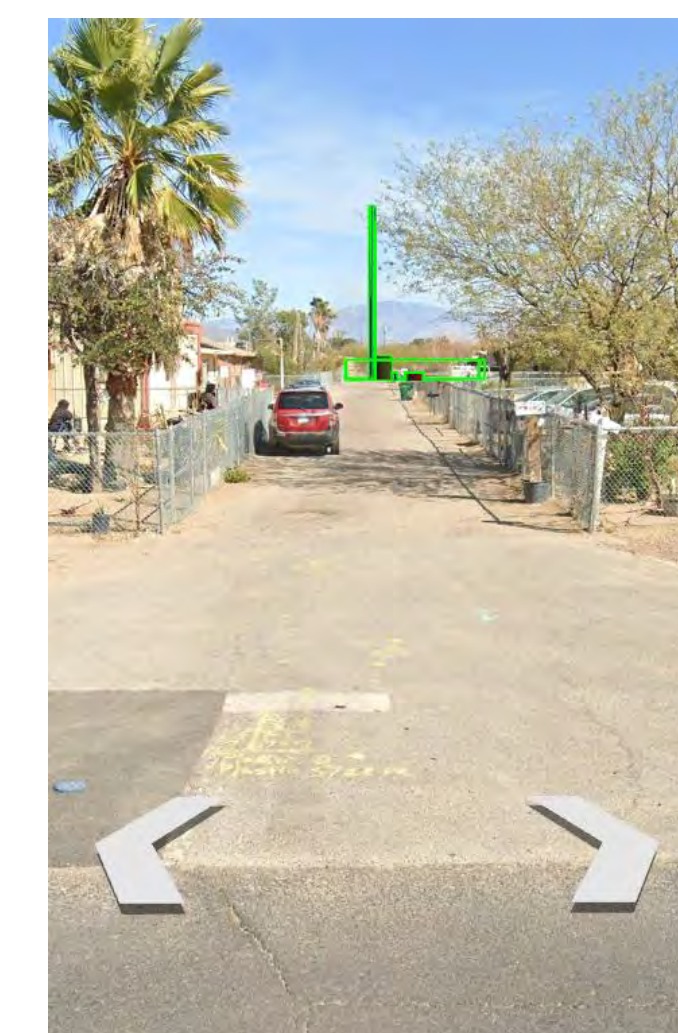
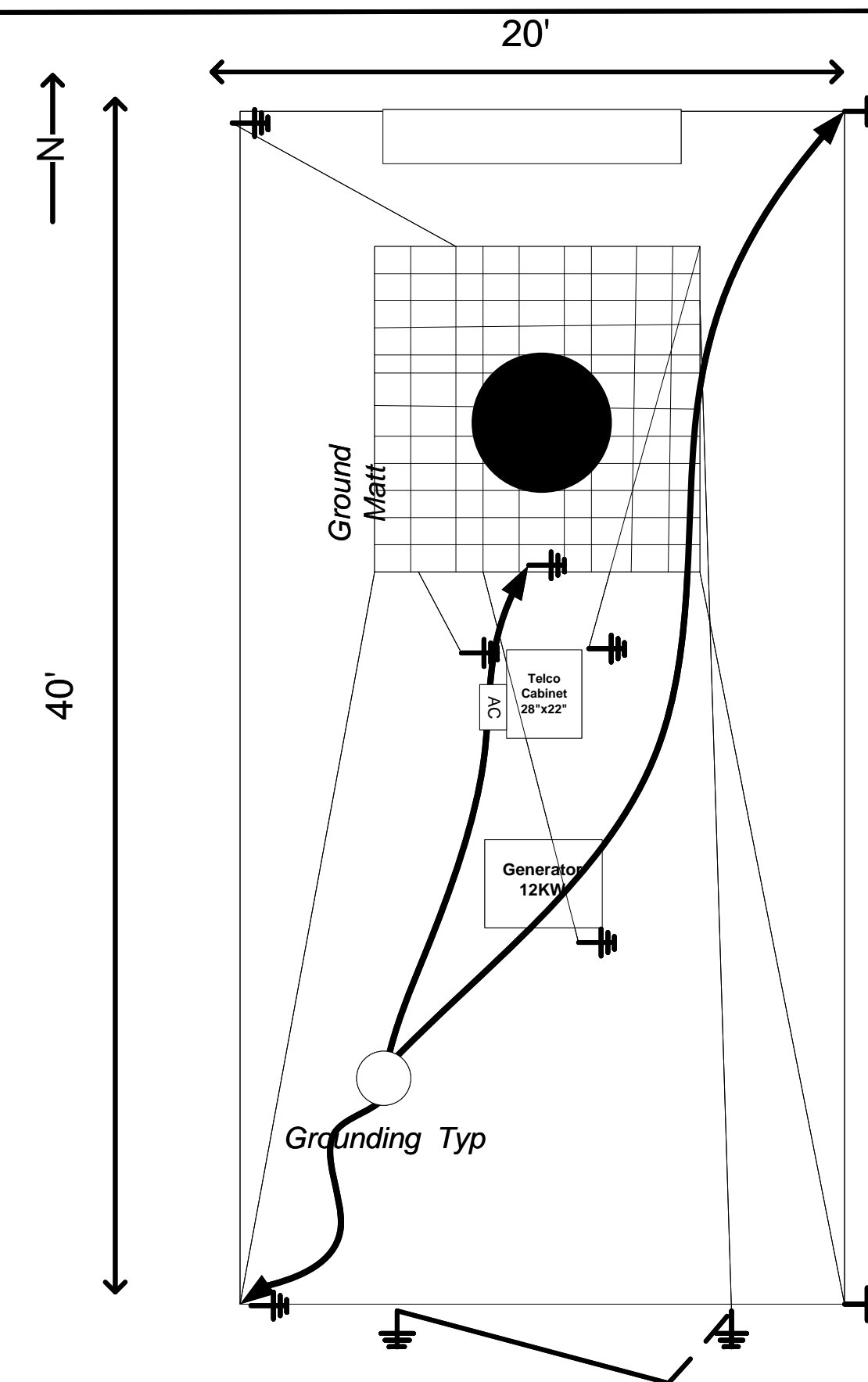
SITE NAME:
Marana Tower Site

SITE ADDRESS:
11720-11738 W Camino Pinos,
Marana, AZ 85653

SHEET TITLE:
TOWER SITE SUMMARY

SHEET NUMBER:
TSS-1

ENLARGED SITE PLAN



TOWER & SITE - 3D RENDERING



A: Northerly View from the Center of the Proposed Lease Area



B: Easterly View from the Center of the Proposed Lease Area



C: Southerly View from the Center of the Proposed Lease Area



D: Westerly View from the Center of the Proposed Lease Area

Marana Photographs

ECA ID: 23-001200

ECA



E: Southeasterly Overview of the Proposed Lease Area



F: Southwesterly Overview of the Proposed Lease Area



G: Northerly View of the Proposed Fiber Route



H: Southerly View of the Proposed Fiber Route

Marana Photographs

ECA ID: 23-001200



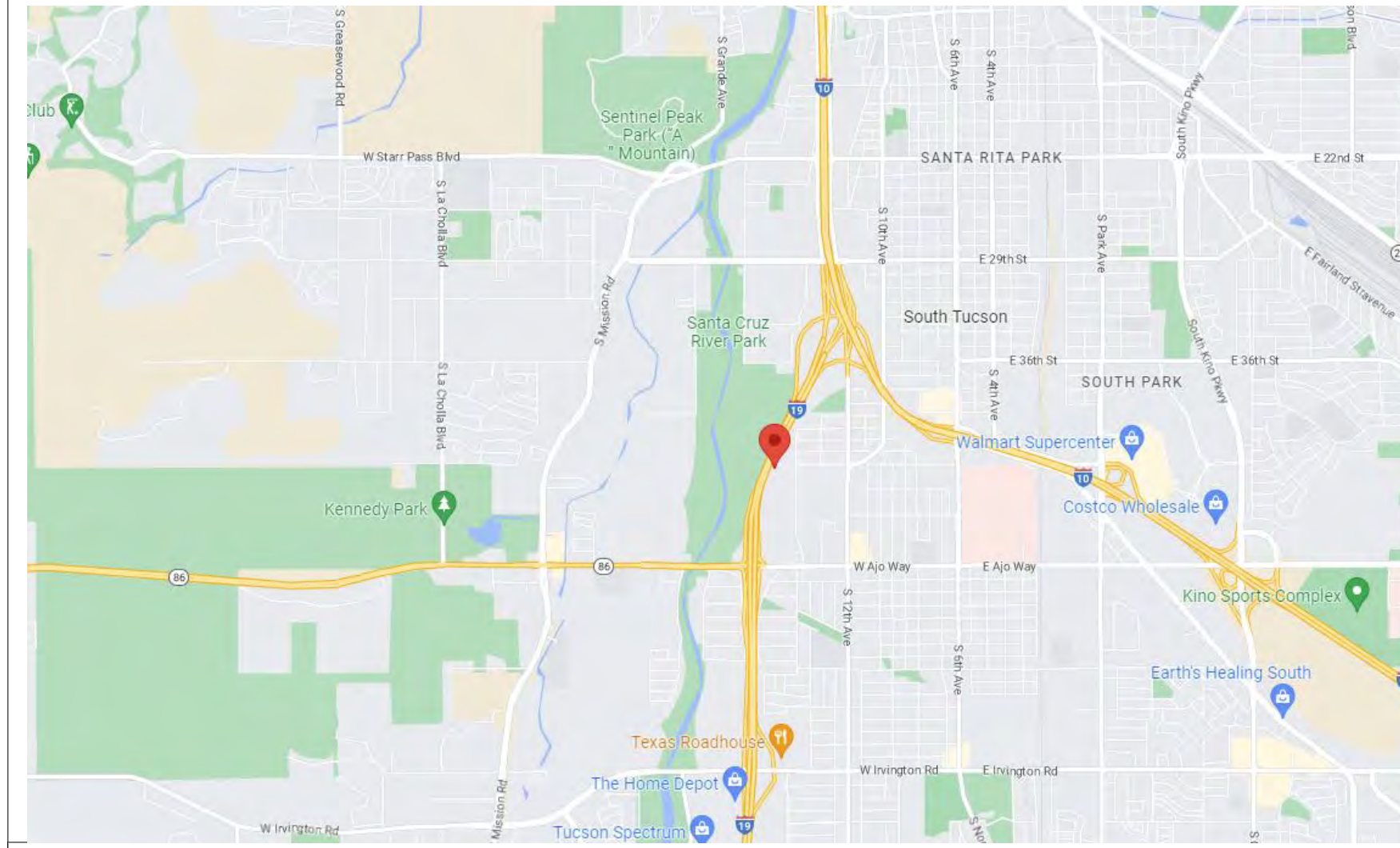


Milagros Tower Site Tucson AZ

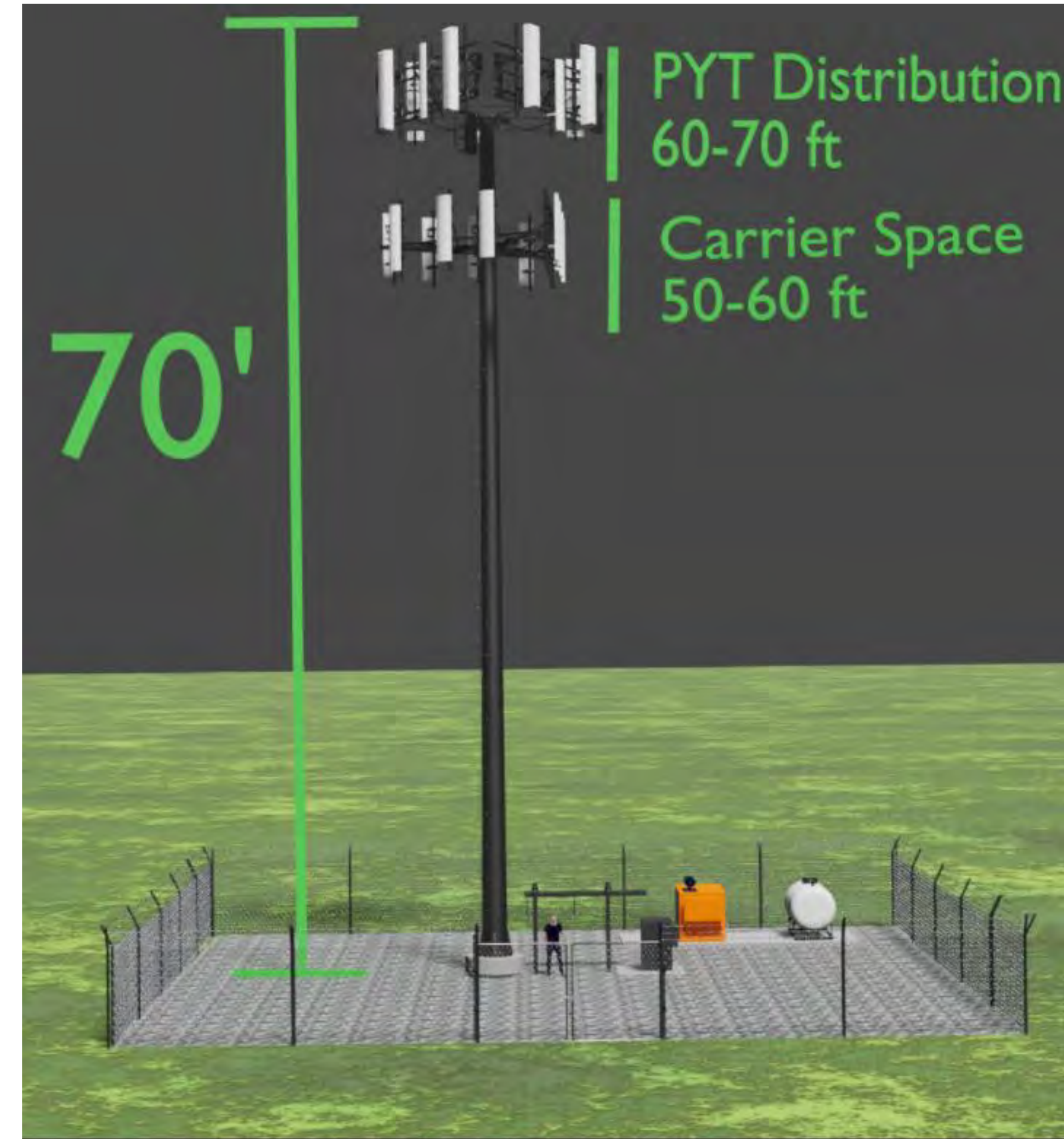
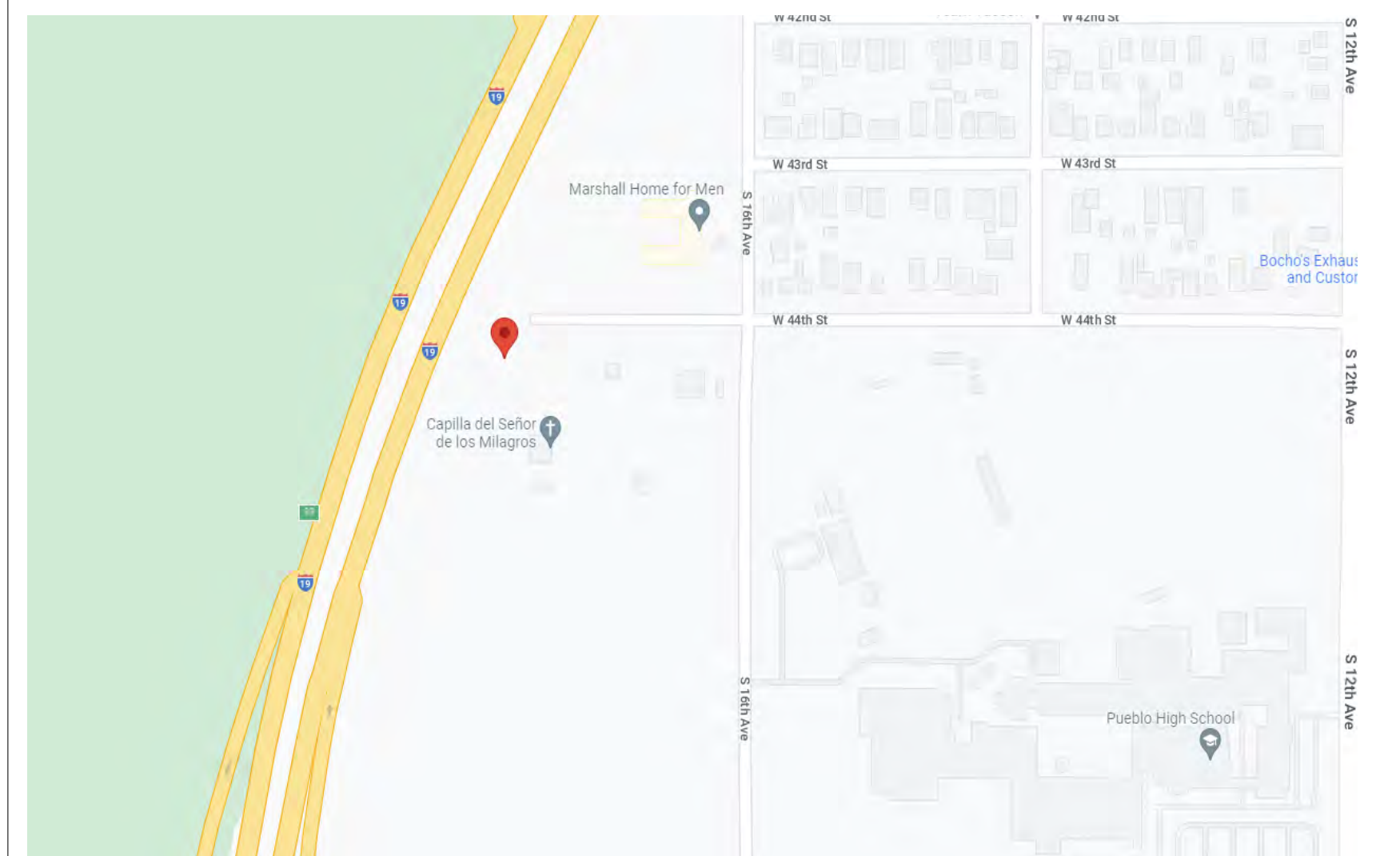
SITE INFORMATION

Asset Number:	
Asset Name:	Barrio Libre Tower
Asset Class:	WIRELESS
Structure Type:	Monopole Tower
Structure Height:	70ft
Address:	899 W 44th St
City:	Tucson
County:	Pima
State:	Arizona
Zip:	85713
Latitude:	32° 11' 06.3" N (32.185075)
Longitude:	110° 59' 00.5" W (-110.983463)

LOCATION MAP



VICINITY MAP



PRELIMINARY

SUBMITTALS			
DATE	DESCRIPTION	REV	ISS. BY
2/16/23	FOR REVIEW	A	D.S.
2/16/23	FINAL	-	A.M.
-	-	-	-
-	-	-	-

DRAWN BY:	C.P.
CHECKED BY:	A.M.
APPROVED BY:	A.M.
NN PROJECT NO:	-

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Pascua Yaqui Tribe of Arizona
7474 S. Camino De Oeste
Tucson, AZ, 85746

PREPARED BY:

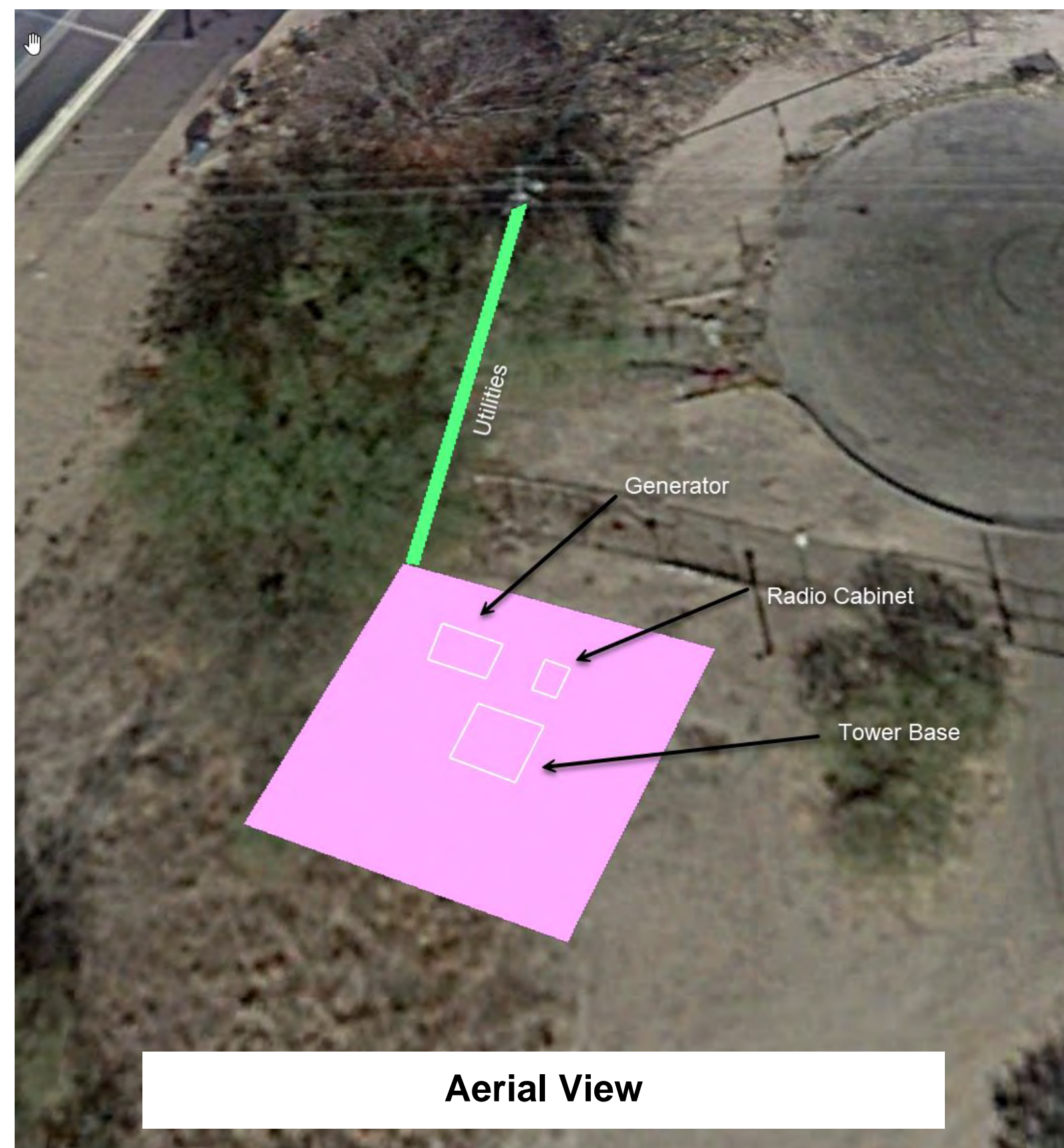


250 E. Penny Road, Suite 200
Wenatchee, WA 98801

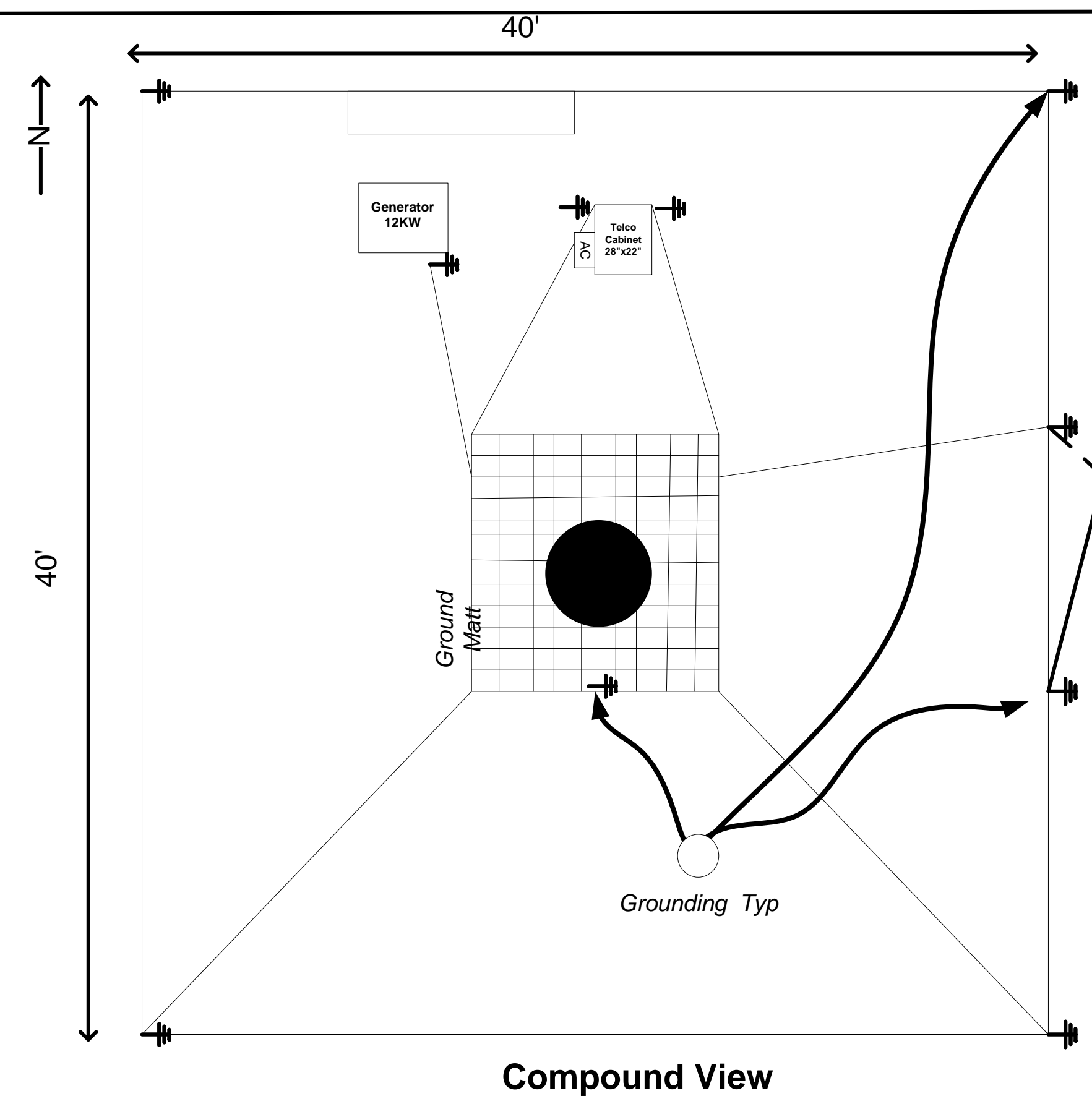
SITE NAME:
Milagros
SITE ADDRESS:
899 W 44th St.
Tucson, AZ, 85713

SHEET TITLE:
TOWER SITE SUMMARY

SHEET NUMBER:
TSS-1



Aerial View



Compound View



TOWER & SITE - 3D RENDERING



A: Northerly View from Near the Center of the Proposed Tower Compound



B: Easterly View from Near the Center of the Proposed Tower Compound



C: Southerly View from Near the Center of the Proposed Tower Compound



D: Westerly View from Near the Center of the Proposed Tower Compound

Milagros Photographs

ECA ID: 23-001190





E: Southeasterly Overview of the Proposed Tower Compound



F: Northwesterly Overview of the Proposed Tower Compound



G: Northeasterly View of the Proposed Fiber Route



H: Southwesterly View of the Proposed Fiber Route

Milagros Photographs

ECA ID: 23-001190



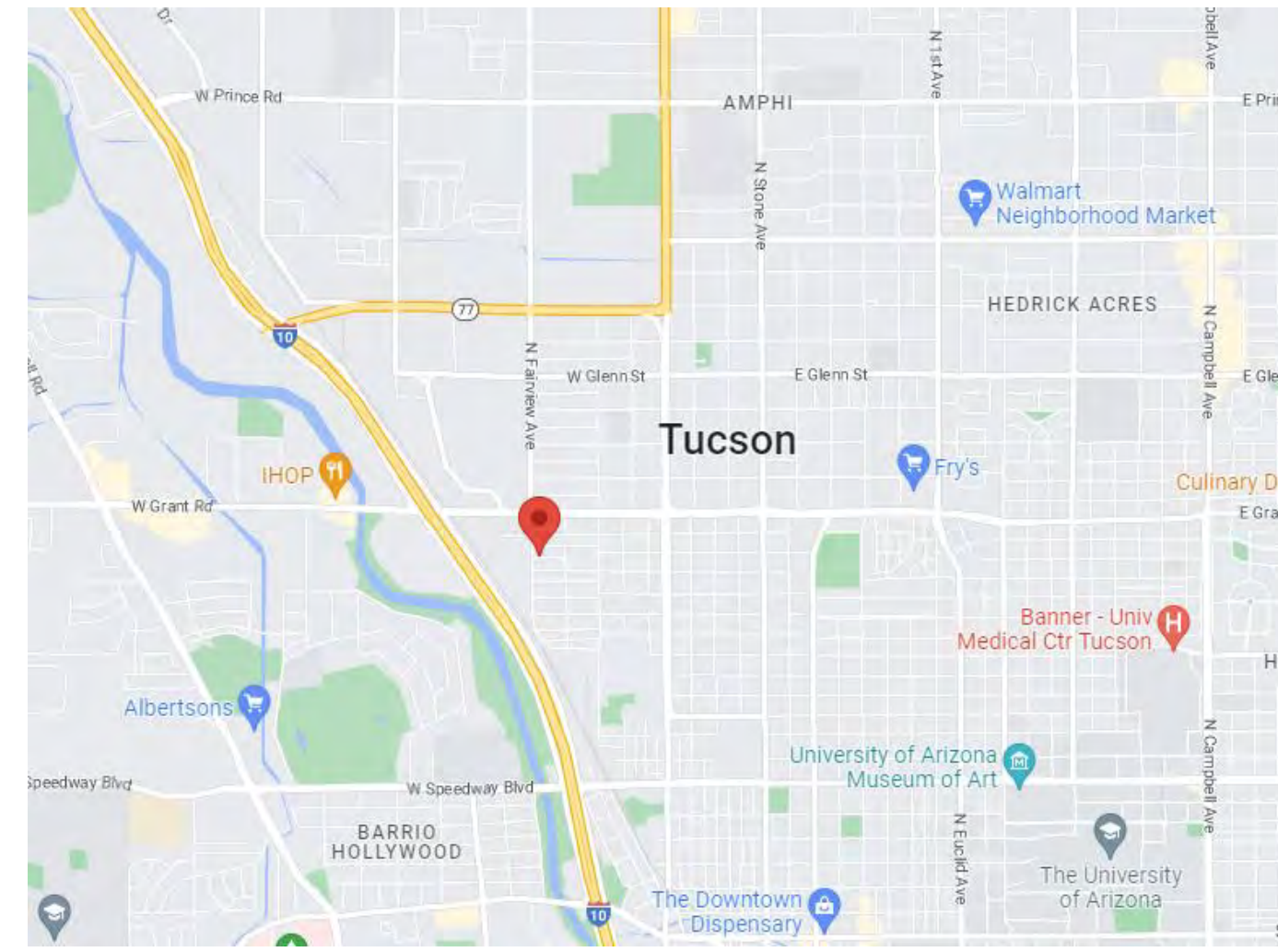


Old Pascua Tucson AZ

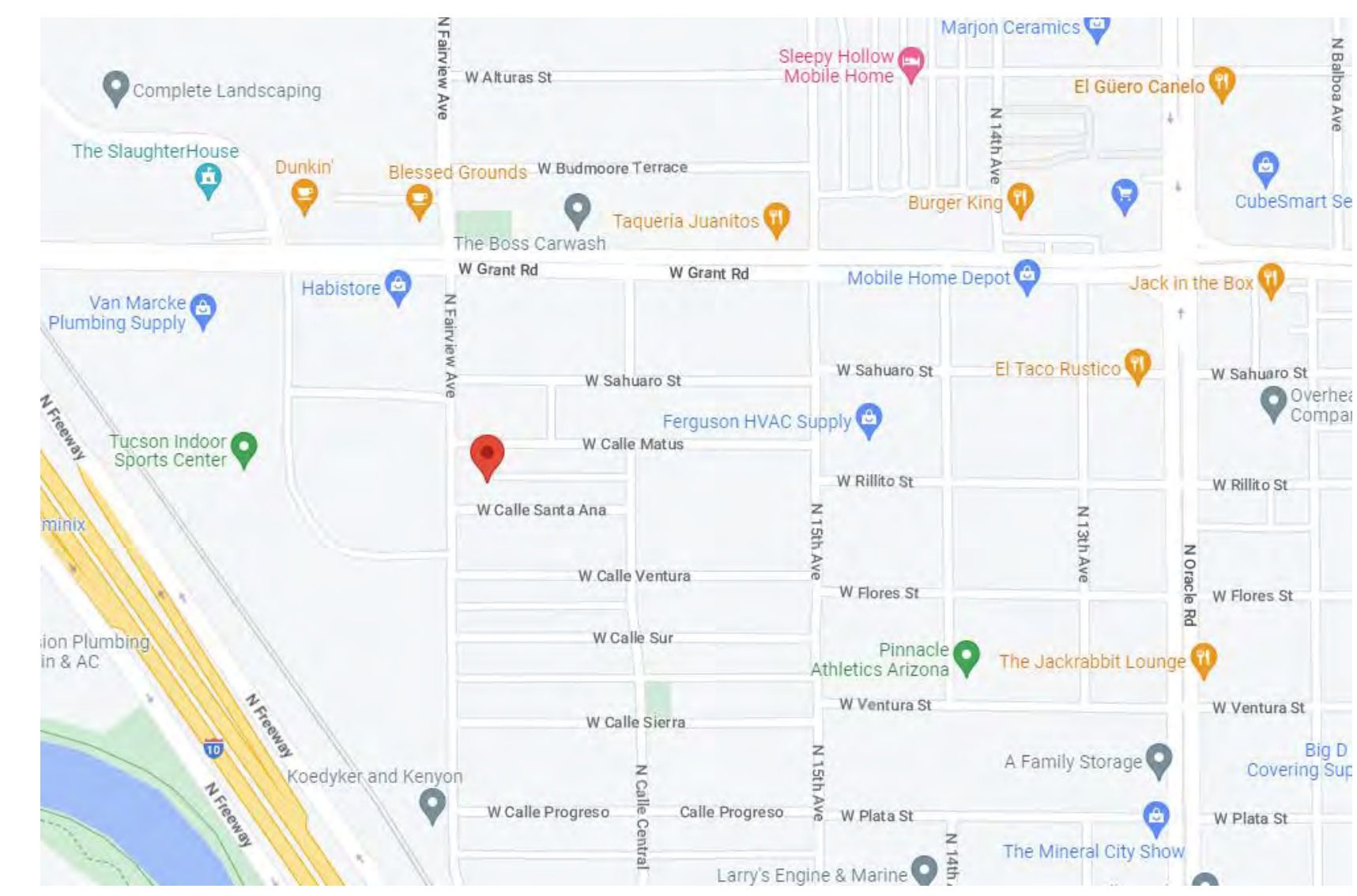
SITE INFORMATION

Asset Number:	
Asset Name:	Old Pascua Tower addition
Asset Class:	WIRELESS
Structure Type:	3-pole tower
Structure Height:	80
Address:	856 W Calle Santa Ana
City:	Tucson
County:	Pima
State:	Arizona
Zip:	85705
Latitude:	32°14'53.34"N (32.248150)
Longitude:	110°59'9.71"W (-110.986031)

LOCATION MAP



VICINITY MAP



TOWER & SITE - 3D RENDERING

PRELIMINARY

SUBMITTALS			
DATE	DESCRIPTION	REV	ISS. BY
2/16/23	FOR REVIEW	A	D.S.
2/16/23	FINAL	-	A.M.
-	-	-	-
-	-	-	-

DRAWN BY:	C.P.
CHECKED BY:	A.M.
APPROVED BY :	A.M.
NN PROJECT NO:	-

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Pascua Yaqui Tribe of Arizona
7474 S. Camino De Oeste
Tucson, AZ, 85746

PREPARED BY:



250 E. Penny Road, Suite 200
Wenatchee, WA 98801

SITE NAME:

Old Pascua

SITE ADDRESS:

856 W Calle Santa Ana
Tucson, AZ 85705

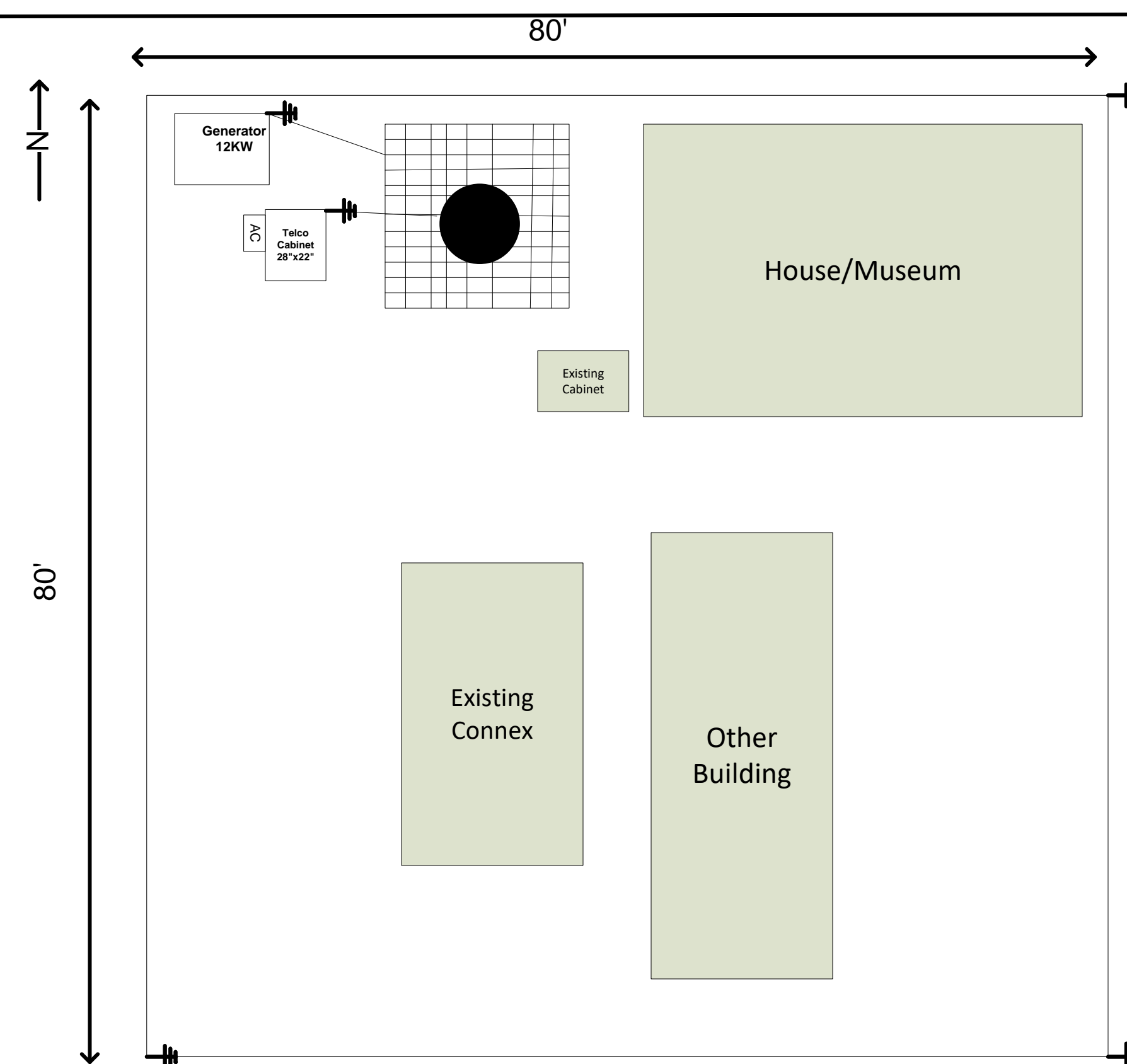
SHEET TITLE:

TOWER SITE SUMMARY

SHEET NUMBER:

TSS-1

ENLARGED SITE PLAN





A: Northerly View from the Existing Tower



B: Easterly View from the Existing Tower



C: Southerly View from the Existing Tower



D: Westerly View from the Existing Tower

Old Pascua Photographs

ECA ID: 23-001203





E: Northeasterly Overview of the Existing Tower



F: Easterly View of the Proposed Fiber Run



G: Northerly View of the Proposed Fiber Run, Proposed Generator and Propane Pad, Proposed Cabinet, and Proposed Power Route Options



H: Easterly View of the Proposed Power Route Option 1

Old Pascua Photographs

ECA ID: 23-001203



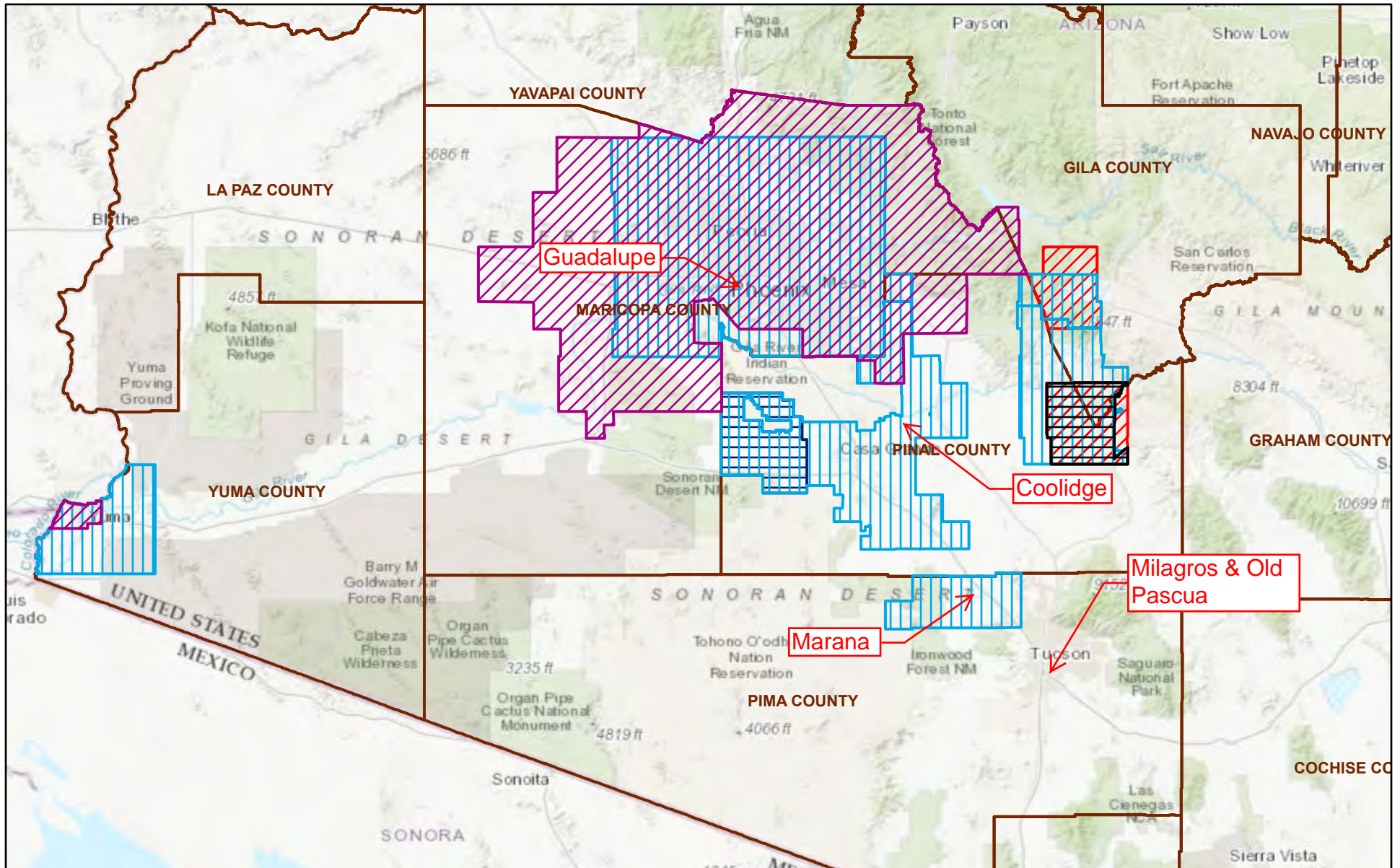


I: Easterly View of the Proposed Power Route Option 2

Appendix B

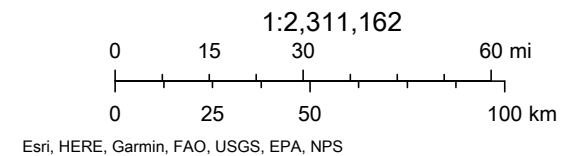
Air Quality

Air Quality in My Community



10/2/2023, 4:36:01 PM

- Ozone (O3) Nonattainment
- PM-2.5 Nonattainment
- Lead (Pb) Nonattainment
- Sulfur Dioxide (SO2) Nonattainment
- PM-10 Nonattainment
- Counties



Air Quality Index Report

Geographic Area: Pima County, AZ

Summary: by County

Year: 2023 (Annual statistics for 2023 are not final until May 1, 2024)

		Number of Days when Air Quality was...						AQI Statistics			Number of Days when AQI Pollutant was...				
County	# Days with AQI	Good	Moderate	Unhealthy for Sensitive Groups	Unhealthy	Very Unhealthy	Hazardous	Maximum	90th Percentile	Median	CO	NO2	O3	PM2.5	PM10
Pima County, AZ	182	81	100	1	.	.	.	147	84	52	1	.	133	17	31

Get detailed information about this report, including column descriptions, at <https://www.epa.gov/outdoor-air-quality-data/about-air-data-reports#aqi>

AirData reports are produced from a direct query of the AQS Data Mart. The data represent the best and most recent information available to EPA from state agencies. However, some values may be absent due to incomplete reporting, and some values may change due to quality assurance activities. The AQS database is updated by state, local, and tribal organizations who own and submit the data.

Readers are cautioned not to rank order geographic areas based on AirData reports. Air pollution levels measured at a particular monitoring site are not necessarily representative of the air quality for an entire county or urban area.

Air Quality Index Report

Geographic Area: Pinal County, AZ

Summary: by County

Year: 2023 (Annual statistics for 2023 are not final until May 1, 2024)

		Number of Days when Air Quality was...						AQI Statistics			Number of Days when AQI Pollutant was...				
County	# Days with AQI	Good	Moderate	Unhealthy for Sensitive Groups	Unhealthy	Very Unhealthy	Hazardous	Maximum	90th Percentile	Median	CO	NO2	O3	PM2.5	PM10
Pinal County, AZ	181	78	85	17	1	.	.	156	100	54	.	.	108	3	70

Get detailed information about this report, including column descriptions, at <https://www.epa.gov/outdoor-air-quality-data/about-air-data-reports#aqi>

AirData reports are produced from a direct query of the AQS Data Mart. The data represent the best and most recent information available to EPA from state agencies. However, some values may be absent due to incomplete reporting, and some values may change due to quality assurance activities. The AQS database is updated by state, local, and tribal organizations who own and submit the data.

Readers are cautioned not to rank order geographic areas based on AirData reports. Air pollution levels measured at a particular monitoring site are not necessarily representative of the air quality for an entire county or urban area.

Air Quality Index Report

Geographic Area: Maricopa County, AZ

Summary: by County

Year: 2023 (Annual statistics for 2023 are not final until May 1, 2024)

		Number of Days when Air Quality was...						AQI Statistics			Number of Days when AQI Pollutant was...				
County	# Days with AQI	Good	Moderate	Unhealthy for Sensitive Groups	Unhealthy	Very Unhealthy	Hazardous	Maximum	90th Percentile	Median	CO	NO2	O3	PM2.5	PM10
Maricopa County, AZ	243	51	148	41	3	.	.	161	112	71	.	1	178	34	30

Get detailed information about this report, including column descriptions, at <https://www.epa.gov/outdoor-air-quality-data/about-air-data-reports#aqi>

AirData reports are produced from a direct query of the AQS Data Mart. The data represent the best and most recent information available to EPA from state agencies. However, some values may be absent due to incomplete reporting, and some values may change due to quality assurance activities. The AQS database is updated by state, local, and tribal organizations who own and submit the data.

Readers are cautioned not to rank order geographic areas based on AirData reports. Air pollution levels measured at a particular monitoring site are not necessarily representative of the air quality for an entire county or urban area.

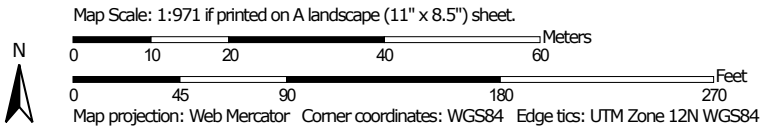
Appendix C

Geology and Soils

Soil Map—Pinal County, Arizona, Western Part




Soil Map may not be valid at this scale.




MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Pinal County, Arizona, Western Part

Survey Area Data: Version 19, Aug 26, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Feb 18, 2020—Mar 7, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Farmland Classification

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
28	Laveen loam	Prime farmland if irrigated	0.4	100.0%
Totals for Area of Interest			0.4	100.0%

Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

Aggregation Method: No Aggregation Necessary

Aggregation is the process by which a set of component attribute values is reduced to a single value that represents the map unit as a whole.

A map unit is typically composed of one or more "components". A component is either some type of soil or some nonsoil entity, e.g., rock outcrop. For the attribute being aggregated, the first step of the aggregation process is to derive one attribute value for each of a map unit's components. From this set of component attributes, the next step of the aggregation process derives a single value that represents the map unit as a whole. Once a single value for each map unit is derived, a thematic map for soil map units can be rendered. Aggregation must be done because, on any soil map, map units are delineated but components are not.

For each of a map unit's components, a corresponding percent composition is recorded. A percent composition of 60 indicates that the corresponding component typically makes up approximately 60% of the map unit. Percent composition is a critical factor in some, but not all, aggregation methods.

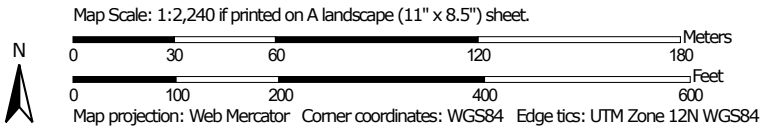
The majority of soil attributes are associated with a component of a map unit, and such an attribute has to be aggregated to the map unit level before a thematic map can be rendered. Map units, however, also have their own attributes. An attribute of a map unit does not have to be aggregated in order to render a corresponding thematic map. Therefore, the "aggregation method" for any attribute of a map unit is referred to as "No Aggregation Necessary".

Tie-break Rule: Lower

Soil Map—Tucson-Avra Valley Area, Arizona




Soil Map may not be valid at this scale.




MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Tucson-Avra Valley Area, Arizona

Survey Area Data: Version 15, Aug 29, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Feb 18, 2020—Mar 7, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Farmland Classification

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
GbA	Gila loam, 0 to 1 percent slopes	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	0.4	100.0%
Totals for Area of Interest			0.4	100.0%

Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

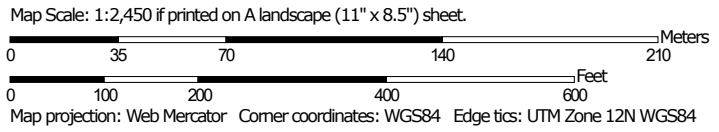
Aggregation Method: No Aggregation Necessary

Tie-break Rule: Lower

Soil Map—Eastern Maricopa and Northern Pinal Counties Area, Arizona



Soil Map may not be valid at this scale.




MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Eastern Maricopa and Northern Pinal Counties Area, Arizona
Survey Area Data: Version 16, Aug 26, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Apr 27, 2020—May 17, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Farmland Classification

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
Va	Valencia sandy loam	Prime farmland if irrigated	0.6	100.0%
Totals for Area of Interest			0.6	100.0%

Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

Aggregation Method: No Aggregation Necessary

Aggregation is the process by which a set of component attribute values is reduced to a single value that represents the map unit as a whole.

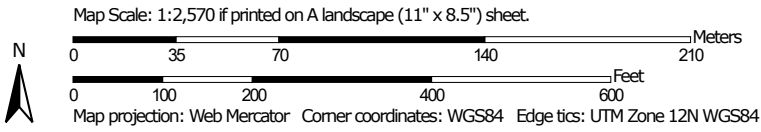
A map unit is typically composed of one or more "components". A component is either some type of soil or some nonsoil entity, e.g., rock outcrop. For the attribute being aggregated, the first step of the aggregation process is to derive one attribute value for each of a map unit's components. From this set of component attributes, the next step of the aggregation process derives a single value that represents the map unit as a whole. Once a single value for each map unit is derived, a thematic map for soil map units can be rendered. Aggregation must be done because, on any soil map, map units are delineated but components are not.

For each of a map unit's components, a corresponding percent composition is recorded. A percent composition of 60 indicates that the corresponding component typically makes up approximately 60% of the map unit. Percent composition is a critical factor in some, but not all, aggregation methods.

The majority of soil attributes are associated with a component of a map unit, and such an attribute has to be aggregated to the map unit level before a thematic map can be rendered. Map units, however, also have their own attributes. An attribute of a map unit does not have to be aggregated in order to render a corresponding thematic map. Therefore, the "aggregation method" for any attribute of a map unit is referred to as "No Aggregation Necessary".


Tie-break Rule: Lower

Soil Map—Tucson-Avra Valley Area, Arizona





MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Tucson-Avra Valley Area, Arizona

Survey Area Data: Version 15, Aug 29, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Apr 1, 2018—May 1, 2018

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Farmland Classification

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
Gm	Grabe silty clay loam	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	0.5	100.0%
Totals for Area of Interest			0.5	100.0%

Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

Aggregation Method: No Aggregation Necessary

Aggregation is the process by which a set of component attribute values is reduced to a single value that represents the map unit as a whole.

A map unit is typically composed of one or more "components". A component is either some type of soil or some nonsoil entity, e.g., rock outcrop. For the attribute being aggregated, the first step of the aggregation process is to derive one attribute value for each of a map unit's components. From this set of component attributes, the next step of the aggregation process derives a single value that represents the map unit as a whole. Once a single value for each map unit is derived, a thematic map for soil map units can be rendered. Aggregation must be done because, on any soil map, map units are delineated but components are not.

For each of a map unit's components, a corresponding percent composition is recorded. A percent composition of 60 indicates that the corresponding component typically makes up approximately 60% of the map unit. Percent composition is a critical factor in some, but not all, aggregation methods.

The majority of soil attributes are associated with a component of a map unit, and such an attribute has to be aggregated to the map unit level before a thematic map can be rendered. Map units, however, also have their own attributes. An attribute of a map unit does not have to be aggregated in order to render a corresponding thematic map. Therefore, the "aggregation method" for any attribute of a map unit is referred to as "No Aggregation Necessary".

Soil Map—Tucson-Avra Valley Area, Arizona



Soil Map may not be valid at this scale.


Map Scale: 1:2,800 if printed on A landscape (11" x 8.5") sheet.



Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 12N WGS84

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)




















Soils





 Soil Map Unit Polygons

 Soil Map Unit Lines


 Soil Map Unit Points

Special Point Features






-  Blowout
-  Borrow Pit
-  Clay Spot
-  Closed Depression
-  Gravel Pit
-  Gravelly Spot
-  Landfill
-  Lava Flow
-  Marsh or swamp
-  Mine or Quarry
-  Miscellaneous Water
-  Perennial Water
-  Rock Outcrop
-  Saline Spot
-  Sandy Spot
-  Severely Eroded Spot
-  Sinkhole
-  Slide or Slip
-  Sodic Spot

-  Spoil Area
-  Stony Spot
-  Very Stony Spot
-  Wet Spot
-  Other
-  Special Line Features

Water Features

 Streams and Canals

Transportation

-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads

Background

 Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
 Web Soil Survey URL:
 Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Tucson-Avra Valley Area, Arizona
 Survey Area Data: Version 15, Aug 29, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Apr 1, 2018—May 1, 2018

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Farmland Classification

Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
CaB	Cave gravelly loam, 0 to 5 percent slopes	Not prime farmland	0.2	74.2%
GoB	Grabe soils, 0 to 3 percent slopes	Not prime farmland	0.1	25.8%
Totals for Area of Interest			0.3	100.0%

Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

Aggregation Method: No Aggregation Necessary

Aggregation is the process by which a set of component attribute values is reduced to a single value that represents the map unit as a whole.

A map unit is typically composed of one or more "components". A component is either some type of soil or some nonsoil entity, e.g., rock outcrop. For the attribute being aggregated, the first step of the aggregation process is to derive one attribute value for each of a map unit's components. From this set of component attributes, the next step of the aggregation process derives a single value that represents the map unit as a whole. Once a single value for each map unit is derived, a thematic map for soil map units can be rendered. Aggregation must be done because, on any soil map, map units are delineated but components are not.

For each of a map unit's components, a corresponding percent composition is recorded. A percent composition of 60 indicates that the corresponding component typically makes up approximately 60% of the map unit. Percent composition is a critical factor in some, but not all, aggregation methods.

The majority of soil attributes are associated with a component of a map unit, and such an attribute has to be aggregated to the map unit level before a thematic map can be rendered. Map units, however, also have their own attributes. An attribute of a map unit does not have to be aggregated in order to render a corresponding thematic map. Therefore, the "aggregation method" for any attribute of a map unit is referred to as "No Aggregation Necessary".

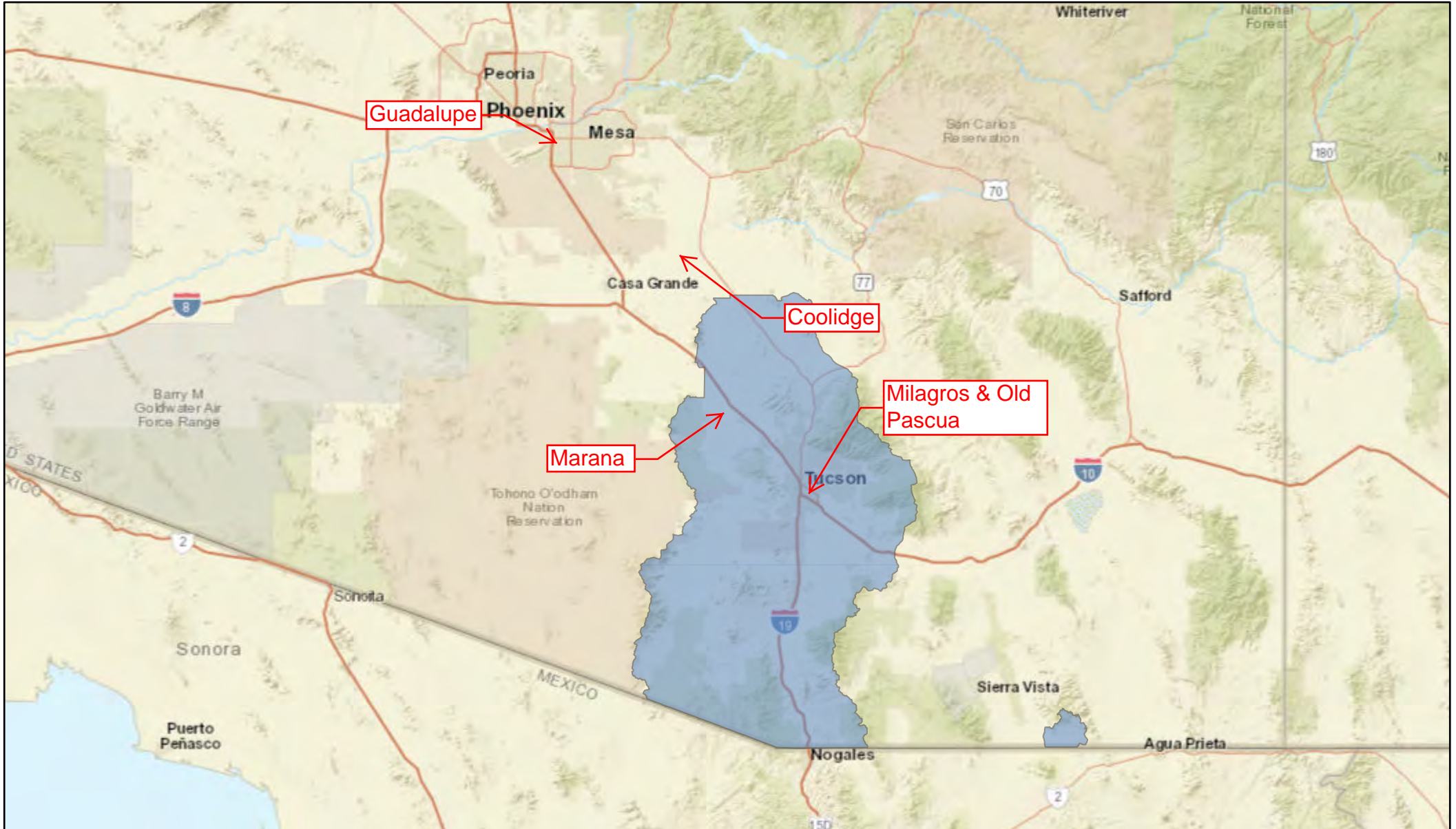
Tie-break Rule: Lower

Appendix D


Water Resources

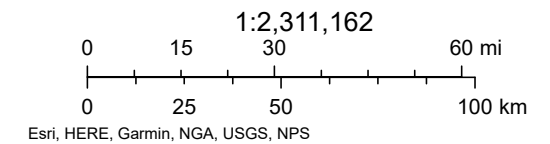
Water Quality

ArcGIS Web AppBuilder



9/28/2023, 9:52:36 PM

 Sole_Source_Aquifers



Floodplain Management and Protection of Wetlands




Coolidge Tower Site



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

May 31, 2023

Wetlands

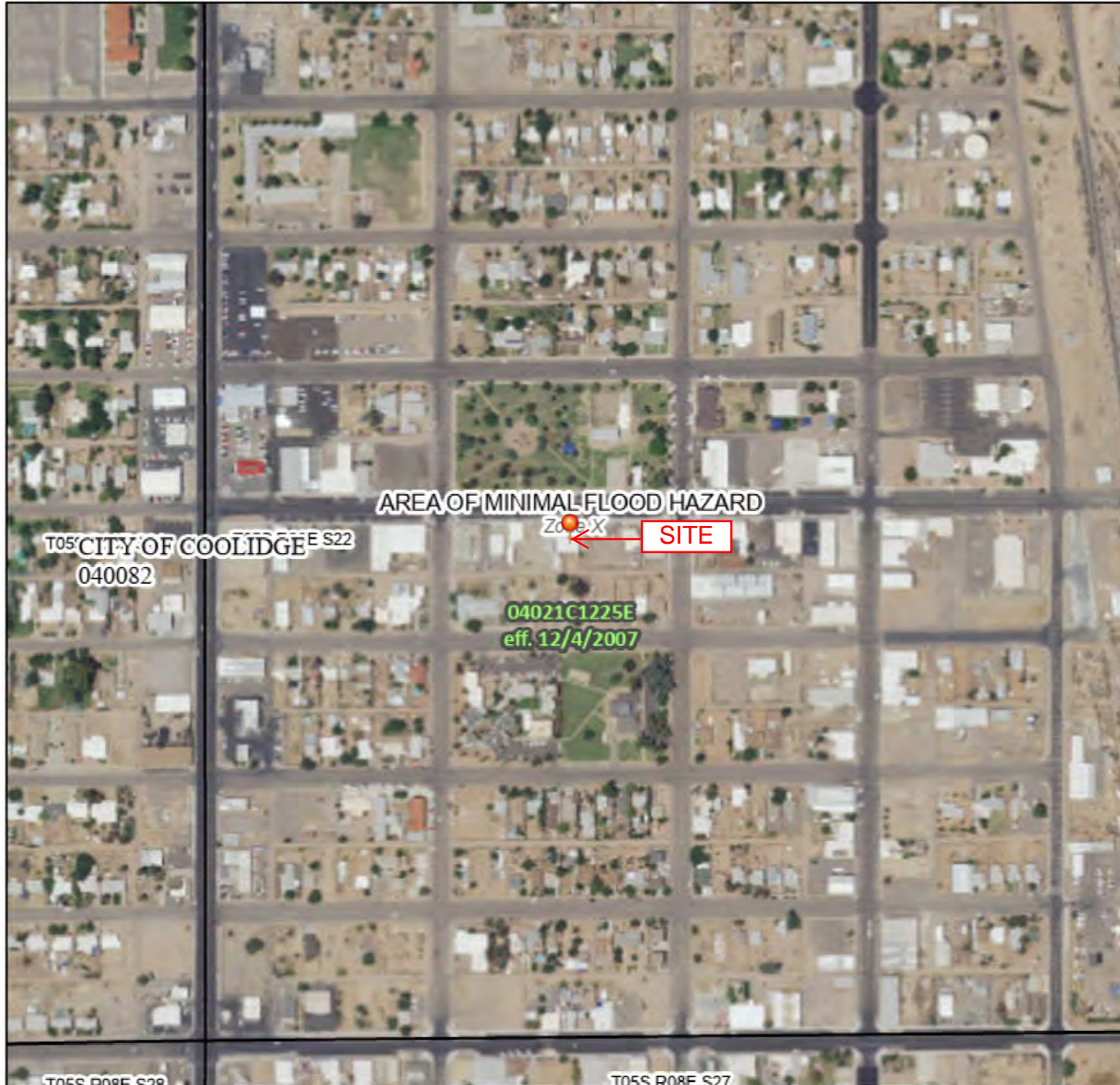
- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMMette



111°31'33"W 32°58'54"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS	
	Without Base Flood Elevation (BFE) Zone A, V, A99
	With BFE or Depth Zone AE, AO, AH, VE, AR
	Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD	
	0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
	Future Conditions 1% Annual Chance Flood Hazard Zone X
	Area with Reduced Flood Risk due to Levee. See Notes. Zone X
	Area with Flood Risk due to Levee Zone D

OTHER AREAS	
	NO SCREEN Area of Minimal Flood Hazard Zone X
	Effective LOMRs
	Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES	
	Channel, Culvert, or Storm Sewer
	Levee, Dike, or Floodwall

OTHER FEATURES	
	20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
	17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
	Coastal Transect
	Base Flood Elevation Line (BFE)
	Limit of Study
	Jurisdiction Boundary
	Coastal Transect Baseline
	Profile Baseline
	Hydrographic Feature

MAP PANELS	
	Digital Data Available
	No Digital Data Available
	Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **5/31/2023 at 12:46 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.


This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Guadalupe Tower Site



July 17, 2023

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMette



111°58'2"W 33°21'54"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS	Without Base Flood Elevation (BFE) Zone A, V, A99	With BFE or Depth Zone AE, AO, AH, VE, AR
	Regulatory Floodway	

OTHER AREAS OF FLOOD HAZARD	0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X	Future Conditions 1% Annual Chance Flood Hazard Zone X	Area with Reduced Flood Risk due to Levee. See Notes. Zone X	Area with Flood Risk due to Levee Zone D

OTHER AREAS	NO SCREEN Area of Minimal Flood Hazard Zone X	Effective LOMRs	Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES	Channel, Culvert, or Storm Sewer	Levee, Dike, or Floodwall

OTHER FEATURES	Cross Sections with 1% Annual Chance Water Surface Elevation	Coastal Transect	Base Flood Elevation Line (BFE)	Limit of Study	Jurisdiction Boundary	Coastal Transect Baseline	Profile Baseline	Hydrographic Feature

MAP PANELS	Digital Data Available	No Digital Data Available	Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **7/17/2023 at 12:39 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



Basemap Imagery Source: USGS National Map 2023







Marana Tower Site



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

May 31, 2023

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMMette



111°13'14"W 32°27'3"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS	Without Base Flood Elevation (BFE) Zone A, V, A99	With BFE or Depth Zone AE, AO, AH, VE, AR	Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD	0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X	Future Conditions 1% Annual Chance Flood Hazard Zone X	Area with Reduced Flood Risk due to Levee. See Notes. Zone X	Area with Flood Risk due to Levee Zone D

OTHER AREAS	NO SCREEN	Area of Minimal Flood Hazard Zone X	Effective LOMRs	Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES	Channel, Culvert, or Storm Sewer	Levee, Dike, or Floodwall

OTHER FEATURES	Cross Sections with 1% Annual Chance Water Surface Elevation	Coastal Transect	Base Flood Elevation Line (BFE)	Limit of Study	Jurisdiction Boundary	Coastal Transect Baseline	Profile Baseline	Hydrographic Feature

MAP PANELS	Digital Data Available	No Digital Data Available	Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **5/31/2023 at 12:49 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.






This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Milagros Tower Site



May 31, 2023

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMMette



110°59'19"W 32°11'21"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

- | | | |
|-----------------------------|--|---|
| SPECIAL FLOOD HAZARD AREAS | | Without Base Flood Elevation (BFE)
Zone A, V, A99 |
| | | With BFE or Depth Zone AE, AO, AH, VE, AR |
| | | Regulatory Floodway |
| OTHER AREAS OF FLOOD HAZARD | | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X |
| | | Future Conditions 1% Annual Chance Flood Hazard Zone X |
| | | Area with Reduced Flood Risk due to Levee. See Notes. Zone X |
| | | Area with Flood Risk due to Levee Zone D |
| OTHER AREAS | | NO SCREEN Area of Minimal Flood Hazard Zone X |
| | | Effective LOMRs |
| GENERAL STRUCTURES | | Area of Undetermined Flood Hazard Zone D |
| | | Channel, Culvert, or Storm Sewer |
| OTHER FEATURES | | Levee, Dike, or Floodwall |
| | | 20.2 Cross Sections with 1% Annual Chance Water Surface Elevation |
| MAP PANELS | | 17.5 Coastal Transect |
| | | Base Flood Elevation Line (BFE) |
| | | Limit of Study |
| | | Jurisdiction Boundary |
| | | Coastal Transect Baseline |
| | | Profile Baseline |
| | | Hydrographic Feature |
| | | Digital Data Available |
| | | No Digital Data Available |
| | | Unmapped |
| | | The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location. |



0 250 500 1,000 1,500 2,000 Feet 1:6,000

110°58'42"W 32°10'51"N

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 5/31/2023 at 12:38 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.






This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Old Pascua Tower Site



April 27, 2023

Wetlands

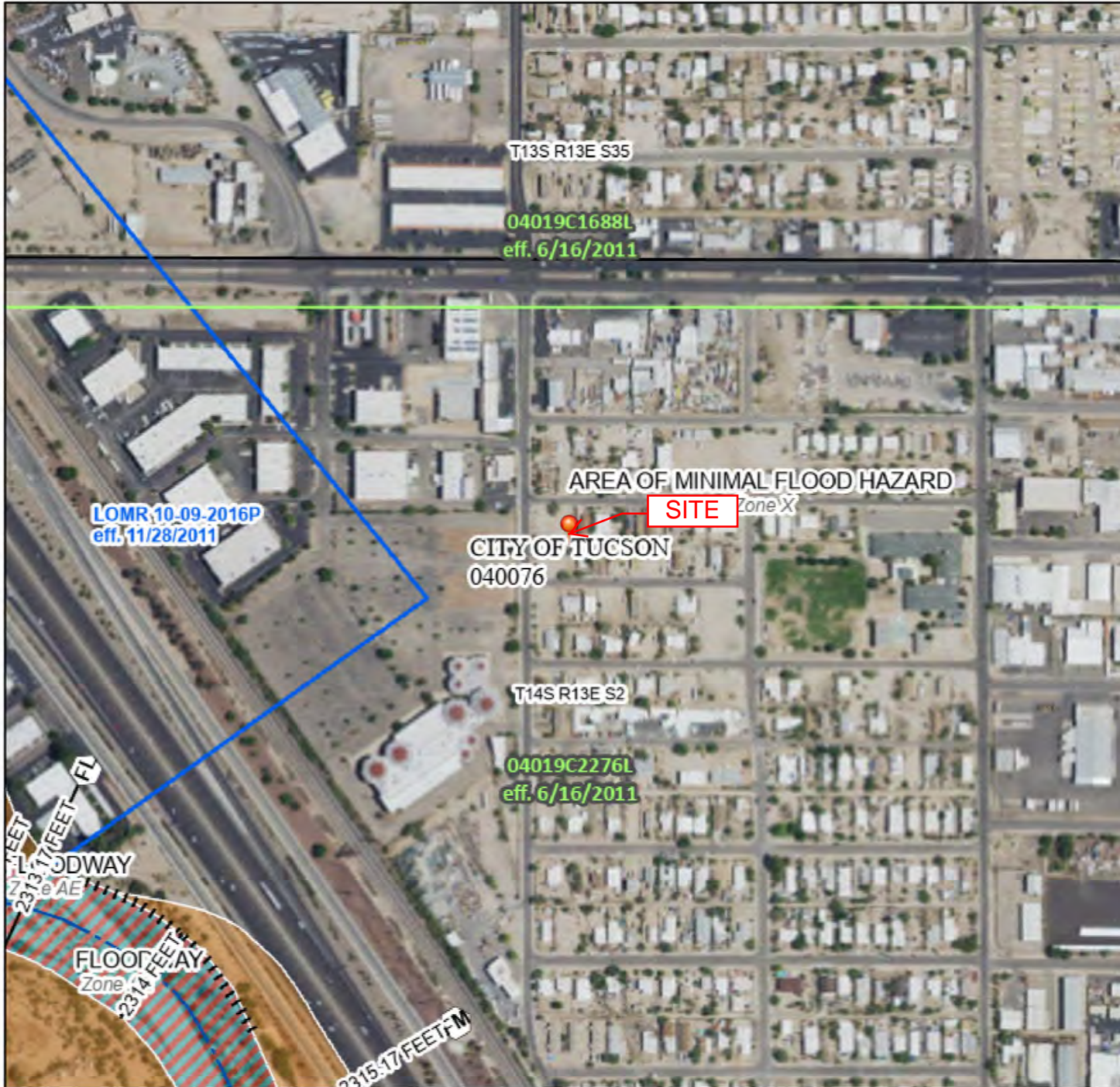
- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMMette



110°59'28"W 32°15'9"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

- | | |
|------------------------------------|---|
| SPECIAL FLOOD HAZARD AREAS | Without Base Flood Elevation (BFE)
Zone A, V, A99 |
| | With BFE or Depth Zone AE, AO, AH, VE, AR |
| | Regulatory Floodway |
| OTHER AREAS OF FLOOD HAZARD | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X |
| | Future Conditions 1% Annual Chance Flood Hazard Zone X |
| | Area with Reduced Flood Risk due to Levee. See Notes. Zone X |
| | Area with Flood Risk due to Levee Zone D |
| OTHER AREAS | NO SCREEN Area of Minimal Flood Hazard Zone X |
| | Effective LOMRs |
| | Area of Undetermined Flood Hazard Zone D |
| GENERAL STRUCTURES | Channel, Culvert, or Storm Sewer |
| | Levee, Dike, or Floodwall |
| OTHER FEATURES | Cross Sections with 1% Annual Chance Water Surface Elevation |
| | Cross Sections with 1% Annual Chance Water Surface Elevation |
| | Coastal Transect |
| | Base Flood Elevation Line (BFE) |
| | Limit of Study |
| | Jurisdiction Boundary |
| | Coastal Transect Baseline |
| | Profile Baseline |
| | Hydrographic Feature |
| MAP PANELS | Digital Data Available |
| | No Digital Data Available |
| | Unmapped |
- The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.



This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **4/27/2023 at 3:36 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

0 250 500 1,000 1,500 2,000 Feet 1:6,000

110°58'51"W 32°14'38"N

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

Appendix E
Biological Resources

Coolidge Tower Site



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

August 1, 2023

U.S. Department of Commerce
National Telecommunications & Information Administration
1401 Constitution Avenue NW
Washington, DC 20230

Attention: Mr. Josh Fitzpatrick

**Subject: Informal Biological Assessment
Proposed 70-Foot Tall Monopole Telecommunications Structure
(Overall Height Including Appurtenances)
Native Networks Site Coolidge
341 W Central Avenue
Coolidge, Pinal County, Arizona
Coolidge, AZ USGS Quadrangle Map
Latitude: N 32° 58' 38.5" W 111° 31' 14.4"
ECA Project Number: 23-001191**

Mr. Fitzpatrick:

Environmental Corporation of America (ECA) is assisting Native Network, Inc. with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

Based on the specifications of the proposed project, the information reviewed, and observations made during our site visit, ECA was able to make a "no effect" determination for the proposed undertaking. Therefore, consultation with the United States Fish and Wildlife Service (USFWS) would not be required. This Informal Biological Assessment (IBA) documents our findings with respect to federally listed or proposed threatened and endangered species at the project site.

Background

The project area location is shown on Figure 1. Figure 2 is a plan view that shows the site configuration. Figure 3 is a recent aerial photograph of the site area. Native Network plans to construct a 70-foot tall (overall height) monopole structure within the project area. The tower would not be lit and no guy wires would be used.

The project area would consist of a proposed approximately 40-foot by 20-foot tower compound and a proposed approximately 40-foot long fiber run. The proposed tower compound is located within an area of bare soil on an urban street block between W Central Ave and W Roosevelt

Ave. The proposed fiber run would extend to the east within a grassed strip between a dirt alley and a chain-link fence. Descriptions of the photographs are provided underneath each photograph and photograph locations are graphically depicted on Figure 2.

Based on National Wetlands Inventory data, no wetlands or waters are mapped within the project area. During the site visit, no evidence of surface waters or the three criteria required for an area to be characterized as wetland was observed. Therefore, it does not appear that the project would result in impacts to wetlands or waters.

Purpose

The purpose of this letter is to provide you with documentation of our investigations and findings relative to federally listed or proposed threatened and endangered species within the project area.

Review of Available Documentation and Site Inspection

ECA has reviewed the USFWS Information for Planning and Consultation (IPaC) system species list for the project area and the USFWS Critical Habitat Mapper (see Attachment C). ECA has also reviewed information from various sources pertaining to the habitat requirements of the listed species. Habitat at the site was evaluated during a May 15, 2023 site visit, which was conducted by Shannon Lowman of ECA.

Discussion of Findings

Species recognized by the USFWS as potentially occurring within the project area are listed in the table below along with a habitat description and a finding of effect for each. No designated critical habitat was identified within the project area.

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
Yellow-billed cuckoo	<i>Coccyzus americanus</i>	Threatened	Open woodland (especially where undergrowth is thick), parks, deciduous riparian woodland; in the west, tall cottonwood and willow riparian woodland	No suitable habitat present; No Effect

The proposed tower compound is located within an area of bare soil on an urban street block between W Central Ave and W Roosevelt Ave. The proposed fiber run would extend to the east within a grassed strip between a dirt alley and a chain-link fence. No suitable habitat was identified for any federally listed or proposed threatened or endangered species identified by USFWS as potentially occurring within the project area. A Tower Site Evaluation Form is attached.

Conclusions

Based on the information reviewed and the site inspection, ECA has found no evidence that the project area would provide suitable habitat for any federally listed or proposed species identified by USFWS as potentially occurring within the project area or that any designated or proposed critical habitat is present within the project vicinity. Based on these findings, the proposed

undertaking would have no effect on any federally threatened or endangered species or designated critical habitat. Further, the proposed project would not jeopardize the continued existence of any federally proposed threatened or endangered species and would not result in the destruction or adverse modification of proposed critical habitat.

Closure

Shannon Lowman of ECA conducted the site visit and area inspection, and Ashley Bean collected the applicable information, and compiled this report. Ben Salter, a Principal Scientist at ECA, reviewed this report. Mr. Salter's resume is included in Attachment E.

We appreciate the opportunity to provide you with these professional services. For any questions or additional information, please contact Ashley Bean by phone at 828-505-0755, by email at ashley.bean@eca-usa.com, or by mail at 1340 Patton Avenue, Suite K, Asheville, North Carolina, 28806.

Sincerely yours,
Environmental Corporation of America



Ashley Bean
Project Manager



Ben Salter
Principal Scientist

ATTACHMENT C

Protected Species Information



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Arizona Ecological Services Field Office
9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517
Phone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer To:
Project Code: 2023-0087555
Project Name: 23-001191

May 31, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that *may* occur within the One-Range that has been delineated for the species (candidate, proposed, or listed) and its critical habitat (designated or proposed) with which your project polygon intersects. These range delineations are based on biological metrics, and do not necessarily represent exactly where the species is located. Please refer to the species information found on ECOS to determine if suitable habitat for the species on your list occurs in your project area.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If the Federal action agency determines that listed species or critical habitat *may be affected* by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

or habitat segment may be affected. The effects analysis should include the entire action area, which often extends well outside the project boundary or "footprint." For example, projects that involve streams and river systems should consider downstream affects. If the Federal action agency determines that the action may jeopardize a *proposed* species or may adversely modify *proposed* critical habitat, the agency must enter into a section 7 conference. The agency may choose to confer with us on an action that may affect proposed species or critical habitat.

Candidate species are those for which there is sufficient information to support a proposal for listing. Although candidate species have no legal protection under the Act, we recommend that they be considered in the planning process in the event they become proposed or listed prior to project completion. More information on the regulations (50 CFR 402) and procedures for section 7 consultation, including the role of permit or license applicants, can be found in our Endangered Species Consultation Handbook at: <https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>.

We also advise you to consider species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668 *et seq.*). The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when authorized by the Service. The Eagle Act prohibits anyone, without a permit, from taking (including disturbing) eagles, and their parts, nests, or eggs. Currently 1,026 species of birds are protected by the MBTA, including the western burrowing owl (*Athene cunicularia hypugaea*). Protected western burrowing owls can be found in urban areas and may use their nest/burrows year-round; destruction of the burrow may result in the unpermitted take of the owl or their eggs.

If a bald eagle or golden eagle nest occurs in or near the proposed project area, our office should be contacted for Technical Assistance. An evaluation must be performed to determine whether the project is likely to disturb or harm eagles. The National Bald Eagle Management Guidelines provide recommendations to minimize potential project impacts to bald eagles (see <https://www.fws.gov/law/bald-and-golden-eagle-protection-act> and <https://www.fws.gov/program/eagle-management>).

The Division of Migratory Birds (505/248-7882) administers and issues permits under the MBTA and Eagle Act, while our office can provide guidance and Technical Assistance. For more information regarding the MBTA, BGEPA, and permitting processes, please visit the following web site: <https://www.fws.gov/program/migratory-bird-permit>. Guidance for minimizing impacts to migratory birds for communication tower projects (e.g. cellular, digital television, radio, and emergency broadcast) can be found at <https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation>.

The U.S. Army Corps of Engineers (Corps) may regulate activities that involve streams (including some intermittent streams) and/or wetlands. We recommend that you contact the Corps to determine their interest in proposed projects in these areas. For activities within a National Wildlife Refuge, we recommend that you contact refuge staff for specific information about refuge resources, please visit [this link](#) or visit <https://www.fws.gov/program/national->

[wildlife-refuge-system](#) to locate the refuge you would be working in or around.

If your action is on tribal land or has implications for off-reservation tribal interests, we encourage you to contact the tribe(s) and the Bureau of Indian Affairs (BIA) to discuss potential tribal concerns, and to invite any affected tribe and the BIA to participate in the section 7 consultation. In keeping with our tribal trust responsibility, we will notify tribes that may be affected by proposed actions when section 7 consultation is initiated. For more information, please contact our Tribal Coordinator, John Nystedt, at 928/556-2160 or John.Nystedt@fws.gov.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. Information on known species detections, special status species, and Arizona species of greatest conservation need, such as the western burrowing owl and the Sonoran desert tortoise (*Gopherus morafkai*) can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program (<https://www.azgfd.com/wildlife/planning/projevalprogram/>).

We appreciate your concern for threatened and endangered species. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office. If we may be of further assistance, please contact our Flagstaff office at 928/556-2118 for projects in northern Arizona, our general Phoenix number 602/242-0210 for central Arizona, or 520/670-6144 for projects in southern Arizona.

Sincerely,
/s/

Heather Whitlaw
Field Supervisor
Attachment

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
 - Wetlands
-

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arizona Ecological Services Field Office

9828 North 31st Ave

#c3

Phoenix, AZ 85051-2517

(602) 242-0210

PROJECT SUMMARY

Project Code: 2023-0087555
Project Name: 23-001191
Project Type: Communication Tower New Construction
Project Description: Monopole Tower
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.977266,-111.5207007905629,14z>



Counties: Pinal County, Arizona

ENDANGERED SPECIES ACT SPECIES

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\) list](#) or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bendire's Thrasher <i>Toxostoma bendirei</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9435	Breeds Mar 15 to Jul 31
Gila Woodpecker <i>Melanerpes uropygialis</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5960	Breeds Apr 1 to Aug 31

NAME	BREEDING SEASON
Gilded Flicker <i>Colaptes chrysoides</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2960	Breeds May 1 to Aug 10
Western Grebe <i>aechmophorus occidentalis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743	Breeds Jun 1 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

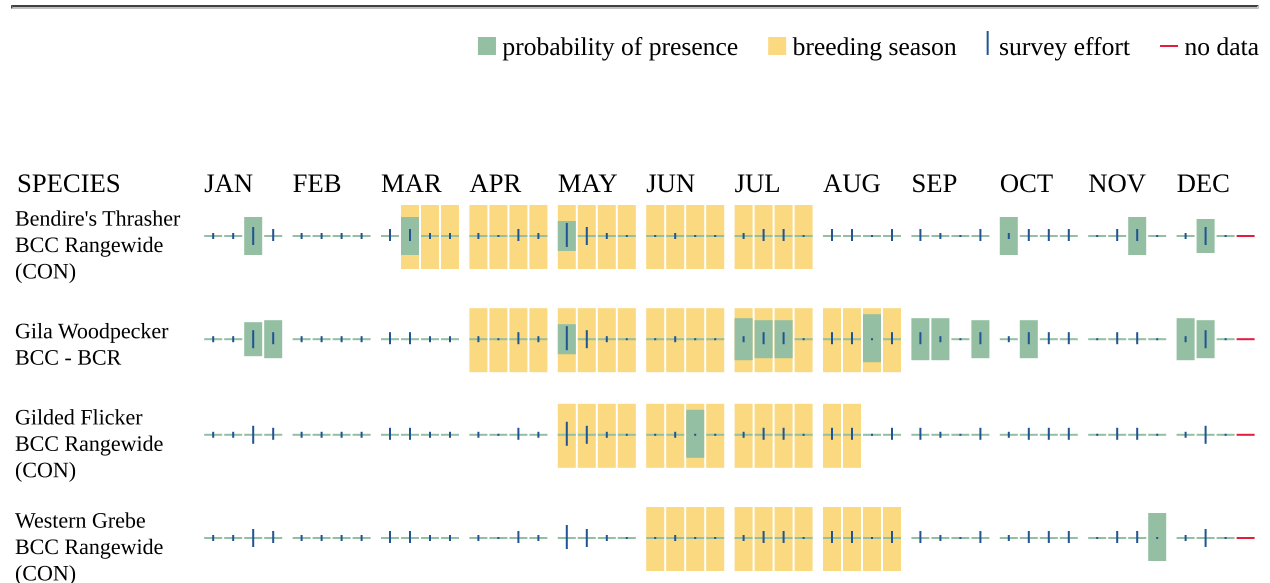
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (-)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding

in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangelwide" birds are [Birds of Conservation Concern \(BCC\)](#) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
-

2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities,

should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America

Name: Ryan Edson

Address: 1375 Union Hill Industrial Ct.

City: Alpharetta

State: GA

Zip: 30004

Email: ryan.edson@eca-usa.com

Phone: 7706672040

ATTACHMENT D

Tower Site Evaluation Form

TOWER SITE EVALUATION FORM

1. Location (Provide maps if possible):

State: AZ County: Pinal

Latitude/Longitude/GPS Grid: N 32° 58' 38.5" W 111° 31' 14.4"

Directions: From Coolidge AZ: Head west on W Central Avenue toward N Main Street for 0.2 miles. The destination will be on the left.

2. Elevation above mean sea level: ~1,420 feet

3. Will the equipment be co-located on an existing **FCC licensed tower** or other existing structure (building, billboard, etc.)? (y/n) No If yes, type of structure: _____

If yes, no further information is required.

4. If no, provide proposed specifications for new tower:

Height: 75' Construction type (lattice, monopole, etc.): Monopole

Guy-wired? (y/n) No No. Bands: NA Total No. Wires: NA

Lighting (Security & Aviation): NA

If tower will be lighted or guy-wired, complete items 5-19. If not, complete only items 19 and 20.

5. Area of tower footprint in acres or square feet: _____

6. Length and width of access road in feet: _____

7. General description of terrain – mountainous, rolling hills flat to undulation, etc. Photographs of the site and surrounding area are beneficial:

8. Meteorological conditions (incidence of fog, low ceilings, etc.): _____

9. Soil type(s): _____

10. Habitat types and land use on and adjacent to the site, by acreage and percentage of total:

11. Dominant vegetative species in each habitat: _____

12. Average diameter breast height of dominant tree species in forested areas: _____

13. Will construction at this site cause fragmentation of a larger block of habitat into two or more smaller blocks? (y/n) _____ If yes, describe: _____

14. Is evidence of birds roosts or rookeries present? (y/n) _____ If yes, describe: _____

15. Distance to nearest wetland area (forested swamp, march, riparian, marine, etc.), and coastline if applicable: _____
16. Distance to nearest telecommunications tower: _____
17. Potential for co-location of antennas on existing towers or other structures: _____
18. Have measures been incorporated to minimizing impacts to migratory birds? (y/n) _____
19. Has an evaluation been made to determine if proposed facility may affect listed or proposed endangered or threatened species or their habitat as required by FCC regulation at 47 CFR 1.1307(a)(3)? (y/n) Yes If, yes present findings: _____ No effect for all listed or proposed species
20. Additional information required:

ATTACHMENT E

Resume



Ben Salter, PWS

Vice President of Environmental and Ecological Services/Principal Scientist
1340 Patton Avenue, Suite K, Asheville, NC 28806
(828) 505-0755
ben.salter@eca-usa.com

EDUCATION

Western Carolina University

Master of Science, Biology, August 2004

Cullowhee, NC

Georgia College & State University

Bachelor of Science, Biology, December 1998
Chemistry Minor

Milledgeville, GA

Short Courses/Specialized Training

OSHA HAZWOPER, 40-hour, 2016
Asbestos Building Inspector, 2015
Tennessee Hydrologic Determination Training Course, 2014
Applying the NEPA Process and Writing Effective NEPA Documents, 2013
Interagency Coordination for Endangered Species, 2013
NEPA Cumulative Effects Analysis, 2013
SonoBat Workshop, 2013
Overview of NHPA Section 106, 2013
GA DOT Coastal Wetland Plant Identification w/ Dr. Bob Mohlenbrock, 2010
Airports Council International – North American NEPA Workshop, 2009
NC State Stream Restoration Design Principles, 2007
Rosgen Level 1 – Applied Fluvial Geomorphology, 2006
VDEQ Stream Impact and Compensation Assessment Manual Workshop, 2006
VIMS Perennial Stream Workshop, 2005

PROFESSIONAL REGISTRATIONS

Society of Wetland Scientists, Professional Wetland Scientist, 2012 to present
EPA AHERA-Accredited Asbestos Building Inspector, 1999 to 2002; 2015 to present

PROFESSIONAL EXPERIENCE

November 2007 – Present

Environmental Corporation of America

Asheville, NC

Position: Principal Scientist, Vice President of Environmental and Ecological Services

Responsibilities:

Technical Compliance Lead and Manager of ECA Environmental Team and Services including Phase I and II ESA, NEPA, T&E Species and Migratory Bird Assessment/Consultation, and Wetlands/Waters delineation and permitting; Responsible for client management, staff development, final QA/QC review, and overall success, efficiency, and technical/regulatory oversight for managed services.

April 2006 – November 2007

Blue Ridge Ecological

Waynesville, NC

Position: Principal Scientist, Partner

Responsibilities:

Partner/Principal Scientist in natural resource management firm focused on fisheries/lake management, watershed assessment, water quality monitoring, and biological assessment.

January 2005 – November 2007

Malcolm Pirnie, Inc.

Newport News, VA

Position: Project Environmental Scientist

Responsibilities:

Wetland and Stream Scientist, National Environmental Policy Act Specialist, and Environmental Scientist; Primary responsibilities included EA and EIS writer, wetland and stream field scientist, and environmental site assessor.

August 2002 – December 2004 **Western Carolina University** Cullowhee, NC
Position: Research and Teaching Assistant
Responsibilities:
Fisheries Scientist and Biology/Ecology Laboratory Instructor

May 2003 – September 2003 **United States Forest Service** Asheville, NC
Position: Biological Science Technician
Responsibilities:
Fisheries scientist for southern Appalachian brook trout project. Collected brook trout tissue samples in headwater streams throughout Western North Carolina and conducted genetic analysis for determining origin.

January 1999 – May 2002 **Environmental Corporation of America** Alpharetta, GA
Position: Project Scientist/Manager
Responsibilities:
Project manager for environmental projects including Phase I and II Environmental Assessments, FCC NEPA assessment, asbestos and lead-based paint inspection, and abatement monitoring and specification preparation, cultural resource assessments, threatened and endangered species surveys, wetland delineation, groundwater monitoring and remediation system installation, geotechnical investigation, construction materials testing, and telecommunications tower construction plan review.

JOURNAL PUBLICATIONS

Miller, JR, **EB Salter**, JB Anderson, PJ Lechler, SL Kondrad, PF Galbreath. 2005. Influence of Temporal Variations in Water Chemistry on the Pb Isotopic Compositions of Rainbow Trout (*Oncorhynchus mykiss*). *Science of the Total Environment*, 350, p. 204-224.

REPRESENTATIVE EXPERIENCE

Wetland/Waters Delineation and Section 404/401 Permitting

Project/Field Scientist and Principal Scientist involvement in wetland/waters delineations and assessments and associated Section 404/401 (Nationwide and Individual Permits), CZMA, and local permitting for projects in over 20 states; Regulatory Lead and staff management in support of all company wetlands/waters related services for the past 10 years.

Phase I and II ESA, Hazardous Remediation/Waste Handling, and Health and Safety Compliance

Qualified Environmental Professional per 40 CFR 312.10(b); Project Scientist/Manager and Principal Scientist involvement in Phase I and II ESAs throughout the nation on a variety of property types including commercial, industrial, municipal, government, communications, and residential facilities, and large undeveloped tracts; Field Staff and Technical Lead for field execution, scoping, and regulatory compliance related to Phase II ESA and coordination of remediation of impacted soil and associated waste disposal and handling as necessary; Primary Phase II and waste disposal and handling experience with existing and proposed communications facilities but with involvement at commercial, industrial, residential, and fuel station/automotive facilities; Technical Lead for preparation of Health and Safety Plans and impacted media management plans for communications facilities across the nation.

National Environmental Policy Act Evaluation/Documentation

Project Manager, Principal Scientist, and lead agency/stakeholder liaison for NEPA related services nationwide for numerous lead federal agencies; Involvement with EIS, EA, Categorical Exclusions, and Feasibility Studies; Expert FCC NEPA Scientist with over 20 years in the communications industry; Commonly works with a prominent Native American Indian Tribe in the Southeast to prepare NEPA documentation for projects located on Tribal-owned lands.

Threatened and Endangered Species and Migratory Bird Evaluation/Consultation

Project and Principal level involvement in thousands of T&E species evaluations and consultations with the USFWS and State Wildlife Agencies including technical assistance, programmatic agreement, self-certification, informal, and formal consultations; Field and Principal level participation in hundreds of migratory bird nest evaluations at communications facilities to ensure compliance with the Migratory Bird Treaty Act; Technical Compliance/Regulatory Lead and staff management in support of all company T&E and migratory bird-related services.

Ryan Edson

From: cboucher@azgfd.gov on behalf of Project Evaluation Program - Game and Fish <pep@azgfd.gov>
Sent: Tuesday, August 15, 2023 7:49 PM
To: Ryan Edson
Subject: Re: Project Evaluation Requests

Hi Ryan,

As the proposed project is located in a previously disturbed area, with the present habitat providing relatively low value to wildlife, the Department does not anticipate any significant adverse impacts to wildlife resources would occur as a result of this project.

This email serves as our official response.

Thank you for the opportunity to review this project.

If you have any questions regarding this letter, please feel free to contact me.

CHERI BOUCHÉR | PROJECT EVALUATION PROGRAM SPECIALIST
ARIZONA GAME AND FISH DEPARTMENT

OFFICE: 623-236-7615

EMAIL: cboucher@azgfd.gov

azgfd.gov | 5000 W. Carefree Highway, Phoenix, AZ 85086

Join our new [Conservation Membership](#) program and ensure a wildlife legacy for the future.

On Wed, Jun 28, 2023 at 11:28 AM Ryan Edson <ryan.edson@eca-usa.com> wrote:

Hello,

Please see the attached project evaluation request for sites within Pima, Pinal, and Maricopa counties.

Thanks!

Ryan Edson (he/him)

Client Manager/Senior NEPA Specialist

Environmental Corporation of America (ECA)

678-477-4509 (Mobile/Remote)

ryan.edson@eca-usa.com

www.eca-usa.com



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June 28, 2023

Arizona Department of Game and Fish
Project Evaluation Program
5000 W. Carefree Highway
Phoenix, AZ 85086-5000

Attention: Ms. Ginger Ritter
Project Evaluation Supervisor

Subject: Proposed 70-Foot Monopole Telecommunications Structure
Native Networks Site Coolidge
341 W Central Avenue
Coolidge, Pinal County, Arizona
Latitude: N 32° 58' 38.5" Longitude: W 111° 31' 14.4"
ECA Project Number: 23-001191

Dear Ms. Ritter:

Environmental Corporation of America (ECA) is assisting Native Networks with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

The purpose of this letter is to request Arizona Game and Fish Department (AGF) comments relative to the potential effects of the proposed project on sensitive natural resources. ECA has utilized the Arizona On-line Environmental Review Tool and has completed a Project Evaluation Request Form. The generated report, completed form, and figures and photographs for the proposed project are attached to this letter.

For any questions or to request additional information, please contact Ryan Edson by phone at 770-667-2040, by email at ryan.edson@eca-usa.com, or by mail at 1375 Union Hill Industrial Court, Alpharetta, GA 30040.

Sincerely yours,
Environmental Corporation of America

A handwritten signature in black ink that reads 'Ryan Edson'.

Ryan Edson
Project Manager

Project Evaluation Request
Arizona Game and Fish Department

Notice: In order to obtain a review of your project, we require all of the information requested on this form to be provided. This review is free of charge. However, due to staff and budgetary constraints, we ask you to submit this form early in the process, as estimated turn around time is 30 days (if you need this review in less than 30 days, please include a needed by date and we will try to accommodate your request). This request is a preliminary review and further project review should include draft documents and a letter formally requesting further environmental review.

Project Evaluation Objectives:

Habitat Evaluation incorporates fish and wildlife resource needs or features in land and water development projects and land and water management planning efforts in Arizona.

Habitat Protection ensures habitat protection through environmental compliance and regulation, and to monitor the implementation and effectiveness of mitigation commitments for various land and water development projects and management planning activities in Arizona.

Instructions:

The following is required to process the request

- Completed form
- Map(s) delineating the project area (preferably a USGS quadrangle map)
- Relevant attachments (other supportive documents, photographs, etc.)

Send to:

Arizona Game and Fish Department
 Project Evaluation Program, WMHB
 5000 W Carefree Highway
 Phoenix, Arizona 85086
 Fax: 623-236-7366
 Email: PEP@azgfd.gov

Proposed Project Information

Project Name and/or Identification Number:

Date of Request:

What is the proposed date you intend to begin work on the project?

Applicant Requesting Project Evaluation

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Individual/Organization/Agency Proposing Project (if different from above)

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Location of Proposed Project *Remember to attach a topographic and/or plat map delineating the project area*

County(ies):

Township(s):

Range(s):

Section(s):

Proposed Project Information (continued)

Please briefly describe the project and project activities.

Briefly describe current land uses and habitat types in the project area.

List any waterbodies such as rivers, intermittent streams, lakes, or wetlands within or near the project area. Xeric washes should also be described, along with any anticipated impacts as a result of the project.

List any reports that have been prepared to describe the habitat that will be affected by the proposed project (e.g. habitat reconnaissance surveys, wetland delineation, etc.)

List any other resources or reviews that relate to the proposed project (correspondence, other phases of the project, other alternatives, etc.)

List any permits, licenses, or regulatory approvals you have or plan on applying for, or have already received as part of this project.

Return as hard copy to AZ Game & Fish Dept., Project Evaluation Program-Habitat Branch, 5000 W Carefree Highway, Phoenix, AZ 85086 or via email to pep@azgfd.gov or fax 623-236-7366

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:

Native Networks Coolidge

User Project Number:

23-001191

Project Description:

Proposed 70-foot monopole telecommunications tower

Project Type:

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

Contact Person:

Ryan Edson

Organization:

ECA

On Behalf Of:

OTHER_FED

Project ID:

HGIS-19416

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. Arizona Wildlife Conservation Strategy (AWCS), specifically Species of Greatest Conservation Need (SGCN), 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.

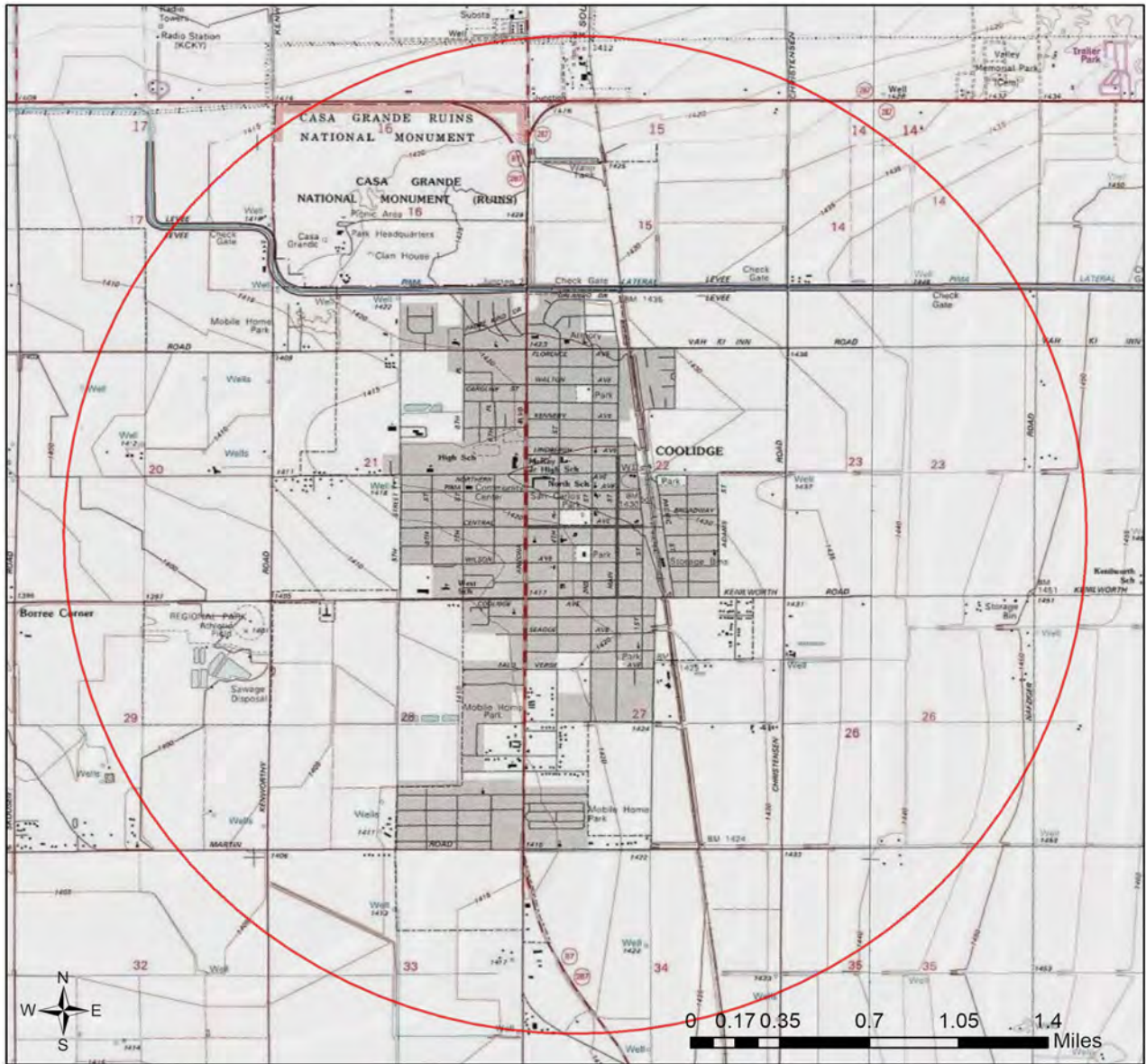
Locations Accuracy Disclaimer:

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

Native Networks Coolidge USA Topo Basemap With Locator Map



- Buffered Project Boundary
- Project Boundary

Project Size (acres): 0.02

Lat/Long (DD): 32.9772 / -111.5206

County(s): Pinal

AGFD Region(s): Tucson

Township/Range(s): T5S, R8E

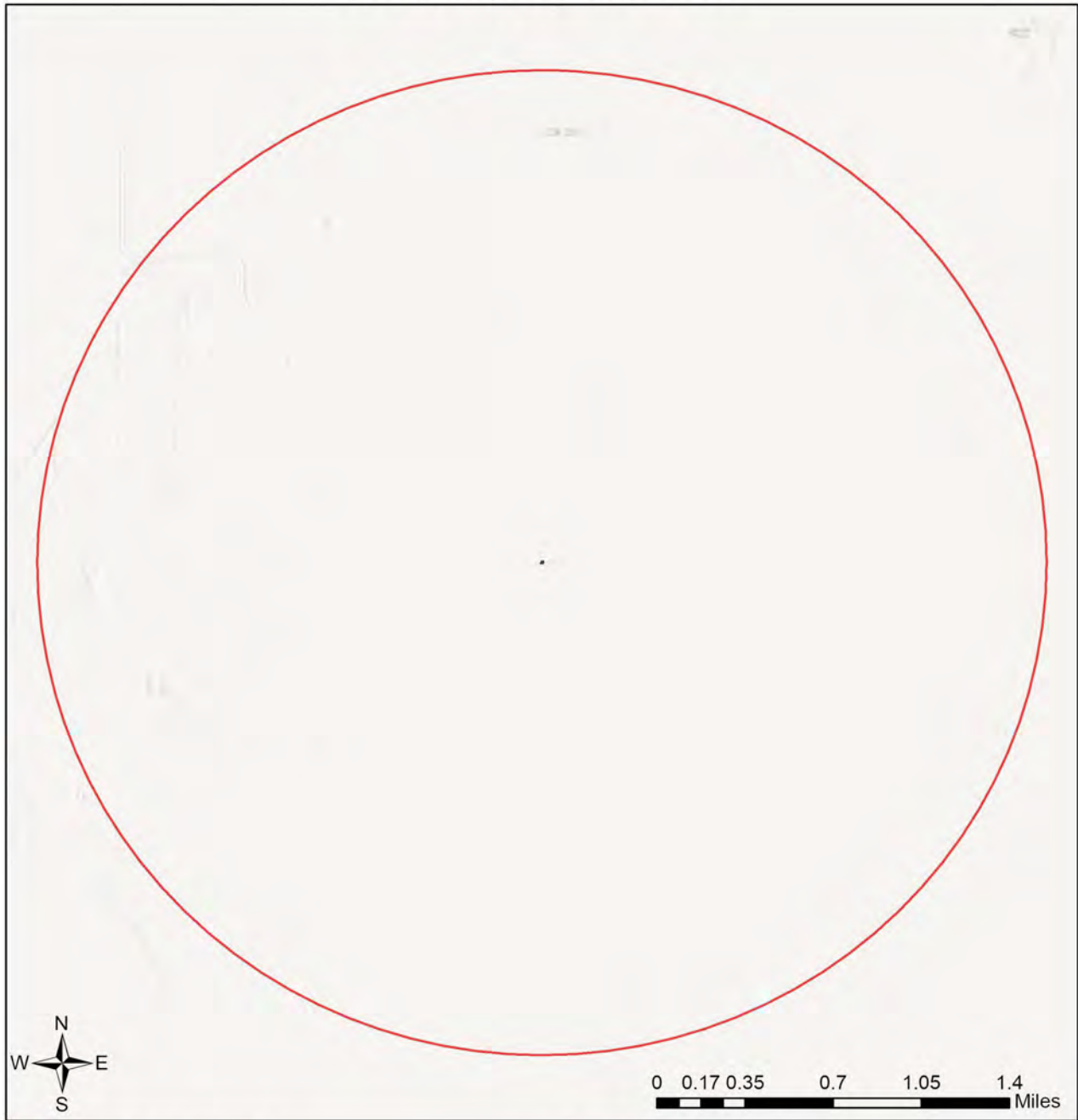
USGS Quad(s): COOLIDGE



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



Native Networks Coolidge

Web Map As Submitted By User

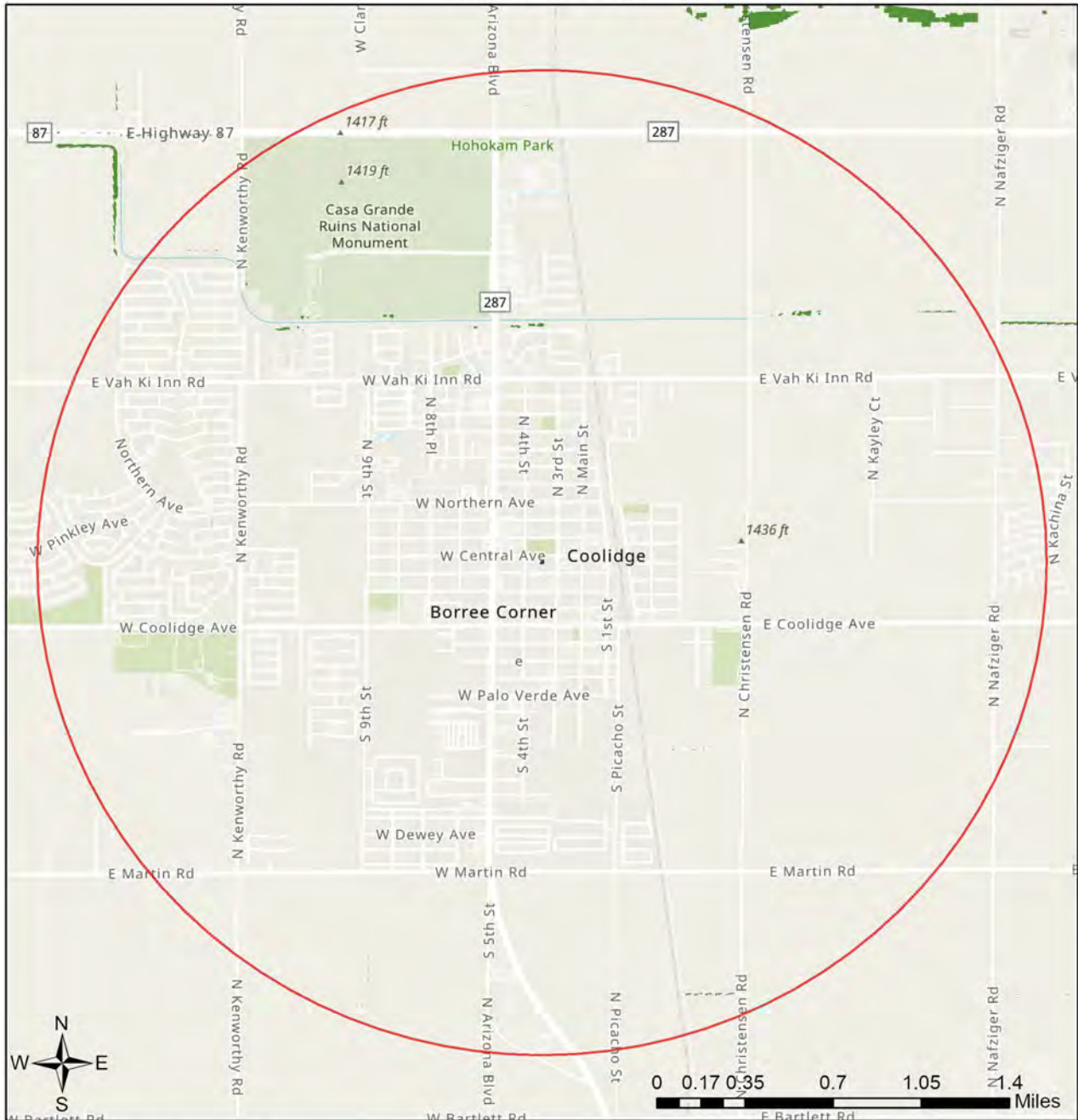


-  Buffered Project Boundary
-  Project Boundary

Project Size (acres): 0.02
Lat/Long (DD): 32.9772 / -111.5206
County(s): Pinal
AGFD Region(s): Tucson
Township/Range(s): T5S, R8E
USGS Quad(s): COOLIDGE

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

Native Networks Coolidge Important Areas



- Buffered Project Boundary
- Project Boundary
- Important Bird Areas
- Critical Habitat
- Pinal County Riparian
- Important Connectivity Zones
- Wildlife Connectivity

Project Size (acres): 0.02
 Lat/Long (DD): 32.9772 / -111.5206
 County(s): Pinal
 AGFD Region(s): Tucson
 Township/Range(s): T5S, R8E
 USGS Quad(s): COOLIDGE

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Native Networks Coolidge Township/Ranges and Land Ownership



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

Project Size (acres): 0.02
 Lat/Long (DD): 32.9772 / -111.5206
 County(s): Pinal
 AGFD Region(s): Tucson
 Township/Range(s): T5S, R8E
 USGS Quad(s): COOLIDGE

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Special Status Species Documented within 2 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		2
Perognathus amplus	Arizona Pocket Mouse					2

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

No Special Areas Detected

No special areas were detected within the project vicinity.

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Athene cunicularia hypugaea	Western Burrowing Owl		S	S		2
Chionactis annulata	Resplendent Shovel-nosed Snake					
Eumops perotis californicus	Greater Western Bonneted Bat			S		2
Icterus bullockii	Bullock's Oriole					2
Mentzelia longiloba var. yavapaiensis	Yavapai Blazingstar					

Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
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, canted, 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 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. See the Arizona Department of Agriculture website for a list of prohibited and restricted noxious weeds at <https://www.invasivespeciesinfo.gov/unitedstates/az.shtml> and the Arizona Native Plant Society <https://aznps.com/invas> for recommendations on how to control. To view a list of documented invasive species or to report invasive species in or near your project area visit iMapInvasives - a national cloud-based application for tracking and managing invasive species at <https://imap.natureserve.org/imap/services/page/map.html>.

- To build a list: zoom to your area of interest, use the identify/measure tool to draw a polygon around your area of interest, and select "See What's Here" for a list of reported species. To export the list, you must have an account and be logged in. You can then use the export tool to draw a boundary and export the records in a csv file.

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 (<https://azstateparks.com/>).

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

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 **Western Burrowing Owls** have been documented within the vicinity of your project area. Please review the western burrowing owl resource page at: <https://www.azgfd.com/wildlife/speciesofgreatestconservneed/burrowingowlmanagement/>.

Guadalupe Tower Site



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August 2, 2023

U.S. Department of Commerce
National Telecommunications & Information Administration
1401 Constitution Avenue NW
Washington, DC 20230

Attention: Mr. Josh Fitzpatrick

**Subject: Informal Biological Assessment
Proposed 20-Foot Roof Mount Telecommunications Structure on the Rooftop
of an Existing Building
Native Network Site Guadalupe
9405 S Avenida Del Yaqui
Guadalupe, Maricopa County, Arizona
Guadalupe, AZ USGS Quadrangle Map
Latitude: N 33° 21' 38.5" W 111° 57' 42.9"
ECA Project Number: 23-001205**

Mr. Fitzpatrick:

Environmental Corporation of America (ECA) is assisting Native Network, Inc. with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

Based on the specifications of the proposed project, the information reviewed, and observations made during our site visit, ECA was able to make a "no effect" determination for the proposed undertaking. Therefore, consultation with the United States Fish and Wildlife Service (USFWS) would not be required. This Informal Biological Assessment (IBA) documents our findings with respect to federally listed or proposed threatened and endangered species at the project site.

Background

The project area location is shown on Figure 1. Figure 2 is a plan view that shows the site configuration. Figure 3 is a recent aerial photograph of the site area. Native Network proposes a 20- tall roof mount telecommunications structure and associated equipment on the rooftop of an existing building. The roof-mount structure would not be lit and no guy wires would be used.

The proposed facility would be located on the rooftop of an existing building located at the corner of W Calle SENU and S Avenida Del Yaqui. Descriptions of the photographs are

provided underneath each photograph and photograph locations are graphically depicted on Figure 2.

Based on National Wetlands Inventory data, no wetlands or waters are mapped within the project area. During the site visit, no evidence of surface waters or the three criteria required for an area to be characterized as wetland was observed. Therefore, it does not appear that the project would result in impacts to wetlands or waters.

Purpose

The purpose of this letter is to provide you with documentation of our investigations and findings relative to federally listed or proposed threatened and endangered species within the project area.

Review of Available Documentation and Site Inspection

ECA has reviewed the USFWS Information for Planning and Consultation (IPaC) system species list for the project area and the USFWS Critical Habitat Mapper (see Attachment C). ECA has also reviewed information from various sources pertaining to the habitat requirements of the listed species. Habitat at the site was evaluated during a May 15, 2023 site visit, which was conducted by Shannon Lowman of ECA.

Discussion of Findings

Species recognized by the USFWS as potentially occurring within the project area are listed in the table below along with a habitat description and a finding of effect for each. No designated critical habitat was identified within the project area.

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
California least tern	<i>Sterna antillarum browni</i>	Endangered	Seacoasts, beaches, bays, estuaries, lagoons, lakes, and rivers during breeding; sandy beaches, mudflats, and salt-pond dikes when resting; shallow depression on level ground on sandy or gravelly beaches and banks of rivers or lakes with sparse or no vegetation during nesting	No suitable habitat present; No Effect
Yellow-billed cuckoo	<i>Coccyzus americanus</i>	Threatened	Open woodland (especially where undergrowth is thick), parks, deciduous riparian woodland; in the west, tall cottonwood and willow riparian woodland	No suitable habitat present; No Effect

The proposed facility would be located on the rooftop of an existing building located at the corner of W Calle SENU and S Avenida Del Yaqui. No suitable habitat was identified for any federally listed or proposed threatened or endangered species identified by USFWS as potentially occurring within the project area. A Tower Site Evaluation Form is attached.

Conclusions

Based on the information reviewed and the site inspection, ECA has found no evidence that the project area would provide suitable habitat for any federally listed or proposed species identified by USFWS as potentially occurring within the project area or that any designated or proposed

critical habitat is present within the project vicinity. Based on these findings, the proposed undertaking would have no effect on any federally threatened or endangered species or designated critical habitat. Further, the proposed project would not jeopardize the continued existence of any federally proposed threatened or endangered species and would not result in the destruction or adverse modification of proposed critical habitat.

Closure

Shannon Lowman of ECA conducted the site visit and area inspection, and Ashley Bean collected the applicable information, and compiled this report. Ben Salter, a Principal Scientist at ECA, reviewed this report. Mr. Salter's resume is included in Attachment E.

We appreciate the opportunity to provide you with these professional services. For any questions or additional information, please contact Ashley Bean by phone at 828-505-0755, by email at ashley.bean@eca-usa.com, or by mail at 1340 Patton Avenue, Suite K, Asheville, North Carolina, 28806.

Sincerely yours,
Environmental Corporation of America



Ashley Bean
Project Manager



Ben Salter
Principal Scientist

ATTACHMENT C

Protected Species Information



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Arizona Ecological Services Field Office
9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517
Phone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer To:
Project Code: 2023-0105265
Project Name: 23-001205

July 17, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that *may* occur within the One-Range that has been delineated for the species (candidate, proposed, or listed) and its critical habitat (designated or proposed) with which your project polygon intersects. These range delineations are based on biological metrics, and do not necessarily represent exactly where the species is located. Please refer to the species information found on ECOS to determine if suitable habitat for the species on your list occurs in your project area.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If the Federal action agency determines that listed species or critical habitat *may be affected* by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

or habitat segment may be affected. The effects analysis should include the entire action area, which often extends well outside the project boundary or "footprint." For example, projects that involve streams and river systems should consider downstream affects. If the Federal action agency determines that the action may jeopardize a *proposed* species or may adversely modify *proposed* critical habitat, the agency must enter into a section 7 conference. The agency may choose to confer with us on an action that may affect proposed species or critical habitat.

Candidate species are those for which there is sufficient information to support a proposal for listing. Although candidate species have no legal protection under the Act, we recommend that they be considered in the planning process in the event they become proposed or listed prior to project completion. More information on the regulations (50 CFR 402) and procedures for section 7 consultation, including the role of permit or license applicants, can be found in our Endangered Species Consultation Handbook at: <https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>.

We also advise you to consider species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668 *et seq.*). The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when authorized by the Service. The Eagle Act prohibits anyone, without a permit, from taking (including disturbing) eagles, and their parts, nests, or eggs. Currently 1,026 species of birds are protected by the MBTA, including the western burrowing owl (*Athene cunicularia hypugaea*). Protected western burrowing owls can be found in urban areas and may use their nest/burrows year-round; destruction of the burrow may result in the unpermitted take of the owl or their eggs.

If a bald eagle or golden eagle nest occurs in or near the proposed project area, our office should be contacted for Technical Assistance. An evaluation must be performed to determine whether the project is likely to disturb or harm eagles. The National Bald Eagle Management Guidelines provide recommendations to minimize potential project impacts to bald eagles (see <https://www.fws.gov/law/bald-and-golden-eagle-protection-act> and <https://www.fws.gov/program/eagle-management>).

The Division of Migratory Birds (505/248-7882) administers and issues permits under the MBTA and Eagle Act, while our office can provide guidance and Technical Assistance. For more information regarding the MBTA, BGEPA, and permitting processes, please visit the following web site: <https://www.fws.gov/program/migratory-bird-permit>. Guidance for minimizing impacts to migratory birds for communication tower projects (e.g. cellular, digital television, radio, and emergency broadcast) can be found at <https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation>.

The U.S. Army Corps of Engineers (Corps) may regulate activities that involve streams (including some intermittent streams) and/or wetlands. We recommend that you contact the Corps to determine their interest in proposed projects in these areas. For activities within a National Wildlife Refuge, we recommend that you contact refuge staff for specific information about refuge resources, please visit [this link](#) or visit <https://www.fws.gov/program/national->

[wildlife-refuge-system](#) to locate the refuge you would be working in or around.

If your action is on tribal land or has implications for off-reservation tribal interests, we encourage you to contact the tribe(s) and the Bureau of Indian Affairs (BIA) to discuss potential tribal concerns, and to invite any affected tribe and the BIA to participate in the section 7 consultation. In keeping with our tribal trust responsibility, we will notify tribes that may be affected by proposed actions when section 7 consultation is initiated. For more information, please contact our Tribal Coordinator, John Nystedt, at 928/556-2160 or John.Nystedt@fws.gov.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. Information on known species detections, special status species, and Arizona species of greatest conservation need, such as the western burrowing owl and the Sonoran desert tortoise (*Gopherus morafkai*) can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program (<https://www.azgfd.com/wildlife/planning/projevalprogram/>).

We appreciate your concern for threatened and endangered species. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office. If we may be of further assistance, please contact our Flagstaff office at 928/556-2118 for projects in northern Arizona, our general Phoenix number 602/242-0210 for central Arizona, or 520/670-6144 for projects in southern Arizona.

Sincerely,
/s/

Heather Whitlaw
Field Supervisor
Attachment

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
 - Wetlands
-

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arizona Ecological Services Field Office

9828 North 31st Ave

#c3

Phoenix, AZ 85051-2517

(602) 242-0210

PROJECT SUMMARY

Project Code: 2023-0105265
Project Name: 23-001205
Project Type: Communication Tower New Construction
Project Description: New Tower Build
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@33.36097395,-111.96180798745485,14z>



Counties: Maricopa County, Arizona

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Sonoran Pronghorn <i>Antilocapra americana sonoriensis</i> Population: U.S.A. (AZ), Mexico No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4750	Experimental Population, Non-Essential

BIRDS

NAME	STATUS
California Least Tern <i>Sterna antillarum browni</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8104	Endangered
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\) list](#) or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Oct 15 to Aug 31
Bendire's Thrasher <i>Toxostoma bendirei</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9435	Breeds Mar 15 to Jul 31

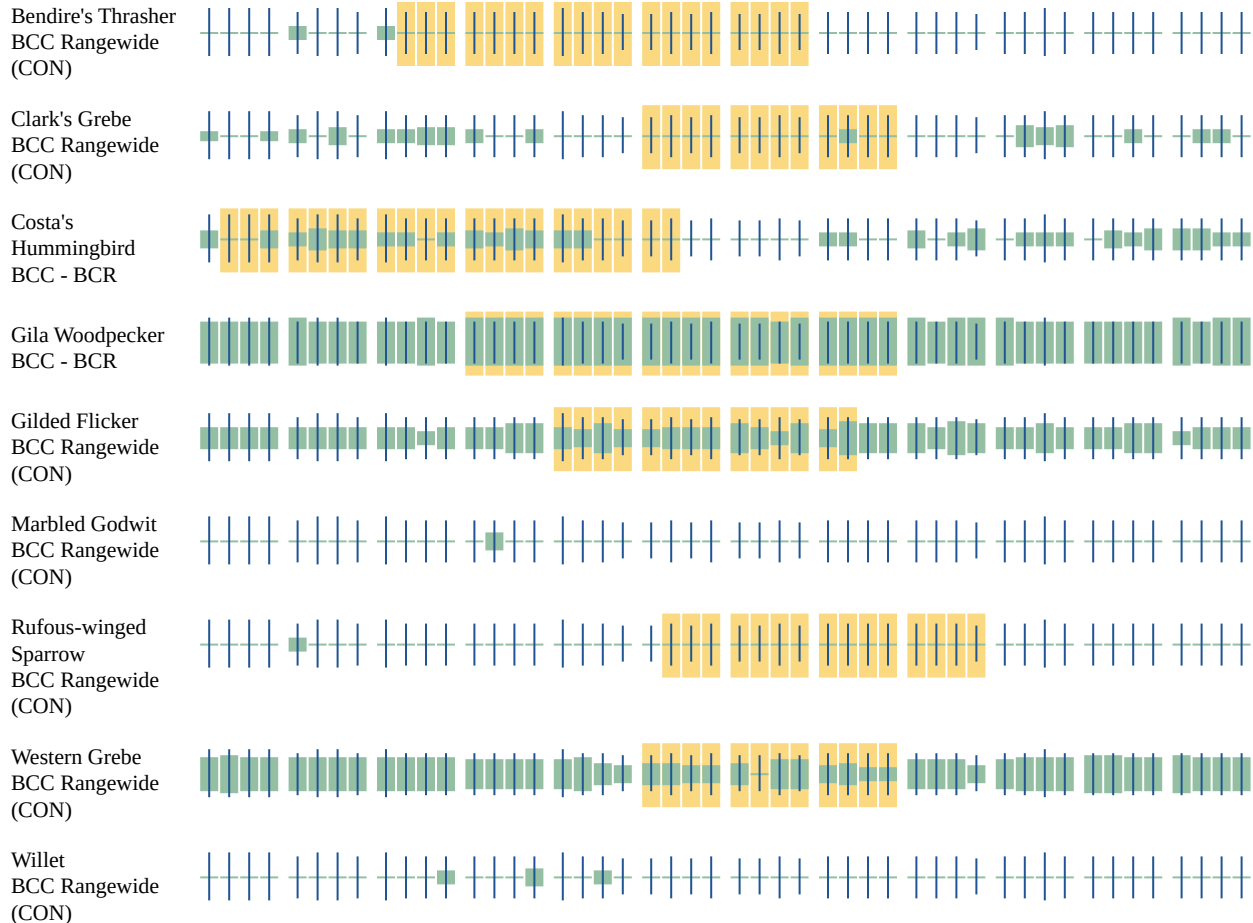
NAME	BREEDING SEASON
<p>Clark's Grebe <i>Aechmophorus clarkii</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Jun 1 to Aug 31
<p>Costa's Hummingbird <i>Calypte costae</i></p> <p>This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9470</p>	Breeds Jan 15 to Jun 10
<p>Gila Woodpecker <i>Melanerpes uropygialis</i></p> <p>This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5960</p>	Breeds Apr 1 to Aug 31
<p>Gilded Flicker <i>Colaptes chrysoides</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2960</p>	Breeds May 1 to Aug 10
<p>Marbled Godwit <i>Limosa fedoa</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481</p>	Breeds elsewhere
<p>Rufous-winged Sparrow <i>Aimophila carpalis</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Jun 15 to Sep 30
<p>Western Grebe <i>aechmophorus occidentalis</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743</p>	Breeds Jun 1 to Aug 31
<p>Willet <i>Tringa semipalmata</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds elsewhere

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#)

may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
-

2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities,

should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America

Name: Ashley Bean

Address: 1340 Patton Avenue

City: Asheville

State: NC

Zip: 28806

Email: ashley.bean@eca-usa.com

Phone: 8285050755

Critical Habitat for Threatened & Endangered Species [USFWS]



A specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

600ft

Maxar

ATTACHMENT D

Tower Site Evaluation Form

TOWER SITE EVALUATION FORM

1. Location (Provide maps if possible):

State: AZ County: Maricopa

Latitude/Longitude/GPS Grid: N 33° 21' 38.5" W 111° 57' 42.9"

Directions: From Maricopa, AZ: Head west on Calle Guadalupe toward S Avenida del Yaqui. Turn left at the 1st cross street onto S Avenida del Yaqui. Turn left and turn left again. The destination will be on the right.

2. Elevation above mean sea level: ~1,240 feet

3. Will the equipment be co-located on an existing **FCC licensed tower** or other existing structure (building, billboard, etc.)? (y/n) No If yes, type of structure: _____

If yes, no further information is required.

4. If no, provide proposed specifications for new tower:

Height: 20' Construction type (lattice, monopole, etc.): Mast

Guy-wired? (y/n) No No. Bands: NA Total No. Wires: NA

Lighting (Security & Aviation): NA

If tower will be lighted or guy-wired, complete items 5-19. If not, complete only items 19 and 20.

5. Area of tower footprint in acres or square feet: _____

6. Length and width of access road in feet: _____

7. General description of terrain – mountainous, rolling hills flat to undulation, etc. Photographs of the site and surrounding area are beneficial:

8. Meteorological conditions (incidence of fog, low ceilings, etc.): _____

9. Soil type(s): _____

10. Habitat types and land use on and adjacent to the site, by acreage and percentage of total:

11. Dominant vegetative species in each habitat: _____

12. Average diameter breast height of dominant tree species in forested areas: _____

13. Will construction at this site cause fragmentation of a larger block of habitat into two or more smaller blocks? (y/n) _____ If yes, describe: _____

14. Is evidence of birds roosts or rookeries present? (y/n) _____ If yes, describe: _____

15. Distance to nearest wetland area (forested swamp, march, riparian, marine, etc.), and coastline if applicable: _____
16. Distance to nearest telecommunications tower: _____
17. Potential for co-location of antennas on existing towers or other structures: _____
18. Have measures been incorporated to minimizing impacts to migratory birds? (y/n) _____
19. Has an evaluation been made to determine if proposed facility may affect listed or proposed endangered or threatened species or their habitat as required by FCC regulation at 47 CFR 1.1307(a)(3)? (y/n) Yes If, yes present findings: _____ No effect for all listed or proposed species
20. Additional information required:

ATTACHMENT E

Resume



Ben Salter, PWS

Vice President of Environmental and Ecological Services/Principal Scientist
1340 Patton Avenue, Suite K, Asheville, NC 28806
(828) 505-0755
ben.salter@eca-usa.com

EDUCATION

Western Carolina University

Master of Science, Biology, August 2004

Cullowhee, NC

Georgia College & State University

Bachelor of Science, Biology, December 1998
Chemistry Minor

Milledgeville, GA

Short Courses/Specialized Training

OSHA HAZWOPER, 40-hour, 2016
Asbestos Building Inspector, 2015
Tennessee Hydrologic Determination Training Course, 2014
Applying the NEPA Process and Writing Effective NEPA Documents, 2013
Interagency Coordination for Endangered Species, 2013
NEPA Cumulative Effects Analysis, 2013
SonoBat Workshop, 2013
Overview of NHPA Section 106, 2013
GA DOT Coastal Wetland Plant Identification w/ Dr. Bob Mohlenbrock, 2010
Airports Council International – North American NEPA Workshop, 2009
NC State Stream Restoration Design Principles, 2007
Rosgen Level 1 – Applied Fluvial Geomorphology, 2006
VDEQ Stream Impact and Compensation Assessment Manual Workshop, 2006
VIMS Perennial Stream Workshop, 2005

PROFESSIONAL REGISTRATIONS

Society of Wetland Scientists, Professional Wetland Scientist, 2012 to present
EPA AHERA-Accredited Asbestos Building Inspector, 1999 to 2002; 2015 to present

PROFESSIONAL EXPERIENCE

November 2007 – Present

Environmental Corporation of America

Asheville, NC

Position: Principal Scientist, Vice President of Environmental and Ecological Services

Responsibilities:

Technical Compliance Lead and Manager of ECA Environmental Team and Services including Phase I and II ESA, NEPA, T&E Species and Migratory Bird Assessment/Consultation, and Wetlands/Waters delineation and permitting; Responsible for client management, staff development, final QA/QC review, and overall success, efficiency, and technical/regulatory oversight for managed services.

April 2006 – November 2007

Blue Ridge Ecological

Waynesville, NC

Position: Principal Scientist, Partner

Responsibilities:

Partner/Principal Scientist in natural resource management firm focused on fisheries/lake management, watershed assessment, water quality monitoring, and biological assessment.

January 2005 – November 2007

Malcolm Pirnie, Inc.

Newport News, VA

Position: Project Environmental Scientist

Responsibilities:

Wetland and Stream Scientist, National Environmental Policy Act Specialist, and Environmental Scientist; Primary responsibilities included EA and EIS writer, wetland and stream field scientist, and environmental site assessor.

August 2002 – December 2004 **Western Carolina University** Cullowhee, NC
Position: Research and Teaching Assistant
Responsibilities:
Fisheries Scientist and Biology/Ecology Laboratory Instructor

May 2003 – September 2003 **United States Forest Service** Asheville, NC
Position: Biological Science Technician
Responsibilities:
Fisheries scientist for southern Appalachian brook trout project. Collected brook trout tissue samples in headwater streams throughout Western North Carolina and conducted genetic analysis for determining origin.

January 1999 – May 2002 **Environmental Corporation of America** Alpharetta, GA
Position: Project Scientist/Manager
Responsibilities:
Project manager for environmental projects including Phase I and II Environmental Assessments, FCC NEPA assessment, asbestos and lead-based paint inspection, and abatement monitoring and specification preparation, cultural resource assessments, threatened and endangered species surveys, wetland delineation, groundwater monitoring and remediation system installation, geotechnical investigation, construction materials testing, and telecommunications tower construction plan review.

JOURNAL PUBLICATIONS

Miller, JR, **EB Salter**, JB Anderson, PJ Lechler, SL Kondrad, PF Galbreath. 2005. Influence of Temporal Variations in Water Chemistry on the Pb Isotopic Compositions of Rainbow Trout (*Oncorhynchus mykiss*). Science of the Total Environment, 350, p. 204-224.

REPRESENTATIVE EXPERIENCE

Wetland/Waters Delineation and Section 404/401 Permitting

Project/Field Scientist and Principal Scientist involvement in wetland/waters delineations and assessments and associated Section 404/401 (Nationwide and Individual Permits), CZMA, and local permitting for projects in over 20 states; Regulatory Lead and staff management in support of all company wetlands/waters related services for the past 10 years.

Phase I and II ESA, Hazardous Remediation/Waste Handling, and Health and Safety Compliance

Qualified Environmental Professional per 40 CFR 312.10(b); Project Scientist/Manager and Principal Scientist involvement in Phase I and II ESAs throughout the nation on a variety of property types including commercial, industrial, municipal, government, communications, and residential facilities, and large undeveloped tracts; Field Staff and Technical Lead for field execution, scoping, and regulatory compliance related to Phase II ESA and coordination of remediation of impacted soil and associated waste disposal and handling as necessary; Primary Phase II and waste disposal and handling experience with existing and proposed communications facilities but with involvement at commercial, industrial, residential, and fuel station/automotive facilities; Technical Lead for preparation of Health and Safety Plans and impacted media management plans for communications facilities across the nation.

National Environmental Policy Act Evaluation/Documentation

Project Manager, Principal Scientist, and lead agency/stakeholder liaison for NEPA related services nationwide for numerous lead federal agencies; Involvement with EIS, EA, Categorical Exclusions, and Feasibility Studies; Expert FCC NEPA Scientist with over 20 years in the communications industry; Commonly works with a prominent Native American Indian Tribe in the Southeast to prepare NEPA documentation for projects located on Tribal-owned lands.

Threatened and Endangered Species and Migratory Bird Evaluation/Consultation

Project and Principal level involvement in thousands of T&E species evaluations and consultations with the USFWS and State Wildlife Agencies including technical assistance, programmatic agreement, self-certification, informal, and formal consultations; Field and Principal level participation in hundreds of migratory bird nest evaluations at communications facilities to ensure compliance with the Migratory Bird Treaty Act; Technical Compliance/Regulatory Lead and staff management in support of all company T&E and migratory bird-related services.

Ryan Edson

From: cboucher@azgfd.gov on behalf of Project Evaluation Program - Game and Fish <pep@azgfd.gov>
Sent: Tuesday, August 15, 2023 7:49 PM
To: Ryan Edson
Subject: Re: Project Evaluation Requests

Hi Ryan,

As the proposed project is located in a previously disturbed area, with the present habitat providing relatively low value to wildlife, the Department does not anticipate any significant adverse impacts to wildlife resources would occur as a result of this project.

This email serves as our official response.

Thank you for the opportunity to review this project.

If you have any questions regarding this letter, please feel free to contact me.

CHERI BOUCHÉR | PROJECT EVALUATION PROGRAM SPECIALIST
ARIZONA GAME AND FISH DEPARTMENT

OFFICE: 623-236-7615

EMAIL: cboucher@azgfd.gov

azgfd.gov | 5000 W. Carefree Highway, Phoenix, AZ 85086

Join our new [Conservation Membership](#) program and ensure a wildlife legacy for the future.

On Wed, Jun 28, 2023 at 11:28 AM Ryan Edson <ryan.edson@eca-usa.com> wrote:

Hello,

Please see the attached project evaluation request for sites within Pima, Pinal, and Maricopa counties.

Thanks!

Ryan Edson (he/him)

Client Manager/Senior NEPA Specialist

Environmental Corporation of America (ECA)

678-477-4509 (Mobile/Remote)

ryan.edson@eca-usa.com

www.eca-usa.com



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ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

June 28, 2023

Arizona Department of Game and Fish
Project Evaluation Program
5000 W. Carefree Highway
Phoenix, AZ 85086-5000

Attention: Ms. Ginger Ritter
Project Evaluation Supervisor

**Subject: Proposed 20-Foot Roof Mount Telecommunications Structure
on the Rooftop of an Existing Building
Native Networks Site Guadalupe
9405 S Avenida Del Yaqui
Guadalupe, Maricopa County, Arizona
Latitude: N 33° 21' 38.5" Longitude: W 111° 57' 42.9"
ECA Project Number: 23-001205**

Dear Ms. Ritter:

Environmental Corporation of America (ECA) is assisting Native Networks with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

The purpose of this letter is to request Arizona Game and Fish Department (AGF) comments relative to the potential effects of the proposed project on sensitive natural resources. ECA has utilized the Arizona On-line Environmental Review Tool and has completed a Project Evaluation Request Form. The generated report, completed form, and figures and photographs for the proposed project are attached to this letter.

For any questions or to request additional information, please contact Ryan Edson by phone at 770-667-2040, by email at ryan.edson@eca-usa.com, or by mail at 1375 Union Hill Industrial Court, Alpharetta, GA 30040.

Sincerely yours,
Environmental Corporation of America

A handwritten signature in black ink that reads 'Ryan Edson'.

Ryan Edson
Project Manager

Project Evaluation Request
Arizona Game and Fish Department

Notice: In order to obtain a review of your project, we require all of the information requested on this form to be provided. This review is free of charge. However, due to staff and budgetary constraints, we ask you to submit this form early in the process, as estimated turn around time is 30 days (if you need this review in less than 30 days, please include a needed by date and we will try to accommodate your request). This request is a preliminary review and further project review should include draft documents and a letter formally requesting further environmental review.

Project Evaluation Objectives:

Habitat Evaluation incorporates fish and wildlife resource needs or features in land and water development projects and land and water management planning efforts in Arizona.

Habitat Protection ensures habitat protection through environmental compliance and regulation, and to monitor the implementation and effectiveness of mitigation commitments for various land and water development projects and management planning activities in Arizona.

Instructions:

The following is required to process the request

- Completed form
- Map(s) delineating the project area (preferably a USGS quadrangle map)
- Relevant attachments (other supportive documents, photographs, etc.)

Send to:

Arizona Game and Fish Department
 Project Evaluation Program, WMHB
 5000 W Carefree Highway
 Phoenix, Arizona 85086
 Fax: 623-236-7366
 Email: PEP@azgfd.gov

Proposed Project Information

Project Name and/or Identification Number:

Date of Request:

What is the proposed date you intend to begin work on the project?

Applicant Requesting Project Evaluation

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Individual/Organization/Agency Proposing Project (if different from above)

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Location of Proposed Project *Remember to attach a topographic and/or plat map delineating the project area*

County(ies):

Township(s):

Range(s):

Section(s):

Proposed Project Information (continued)

Please briefly describe the project and project activities.

Briefly describe current land uses and habitat types in the project area.

List any waterbodies such as rivers, intermittent streams, lakes, or wetlands within or near the project area. Xeric washes should also be described, along with any anticipated impacts as a result of the project.

List any reports that have been prepared to describe the habitat that will be affected by the proposed project (e.g. habitat reconnaissance surveys, wetland delineation, etc.)

List any other resources or reviews that relate to the proposed project (correspondence, other phases of the project, other alternatives, etc.)

List any permits, licenses, or regulatory approvals you have or plan on applying for, or have already received as part of this project.

Return as hard copy to AZ Game & Fish Dept., Project Evaluation Program-Habitat Branch, 5000 W Carefree Highway, Phoenix, AZ 85086 or via email to pep@azgfd.gov or fax 623-236-7366

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:

Native Networks Guadalupe

User Project Number:

23-001205

Project Description:

Proposed 20-foot non-penetrating roof mount on an existing building rooftop with no proposed ground disturbance

Project Type:

Communication, Antenna and/or communication dish installation, Modification to existing structure

Contact Person:

Ryan Edson

Organization:

ECA

On Behalf Of:

OTHER_FED

Project ID:

HGIS-19423

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. Arizona Wildlife Conservation Strategy (AWCS), specifically Species of Greatest Conservation Need (SGCN), 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:

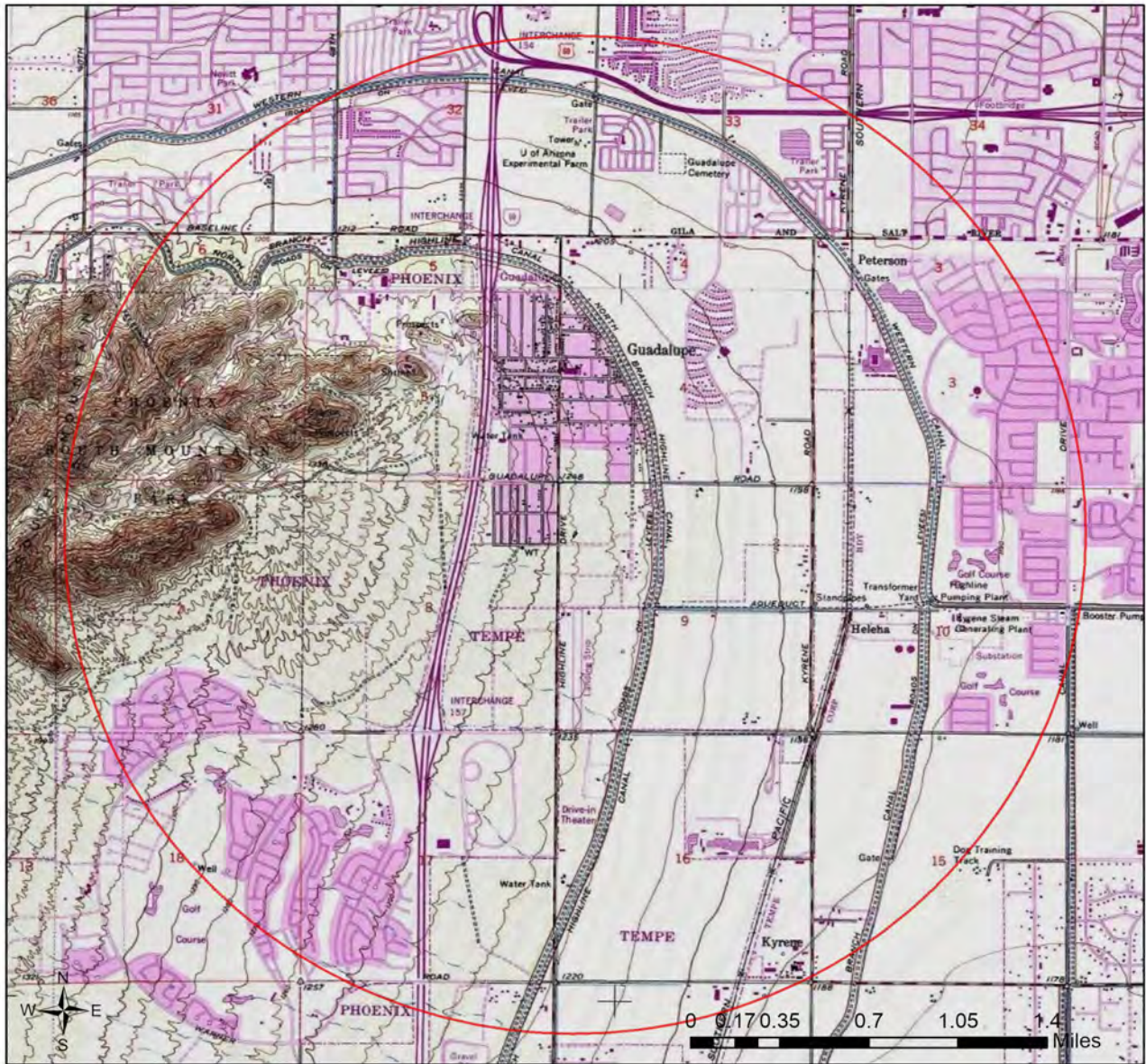
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

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

Native Networks Guadalupe

USA Topo Basemap With Locator Map



- Buffered Project Boundary
- Project Boundary

Project Size (acres): 0.02

Lat/Long (DD): 33.3606 / -111.9620

County(s): Maricopa

AGFD Region(s): Mesa

Township/Range(s): T1S, R4E

USGS Quad(s): GUADALUPE



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



Native Networks Guadalupe

Web Map As Submitted By User

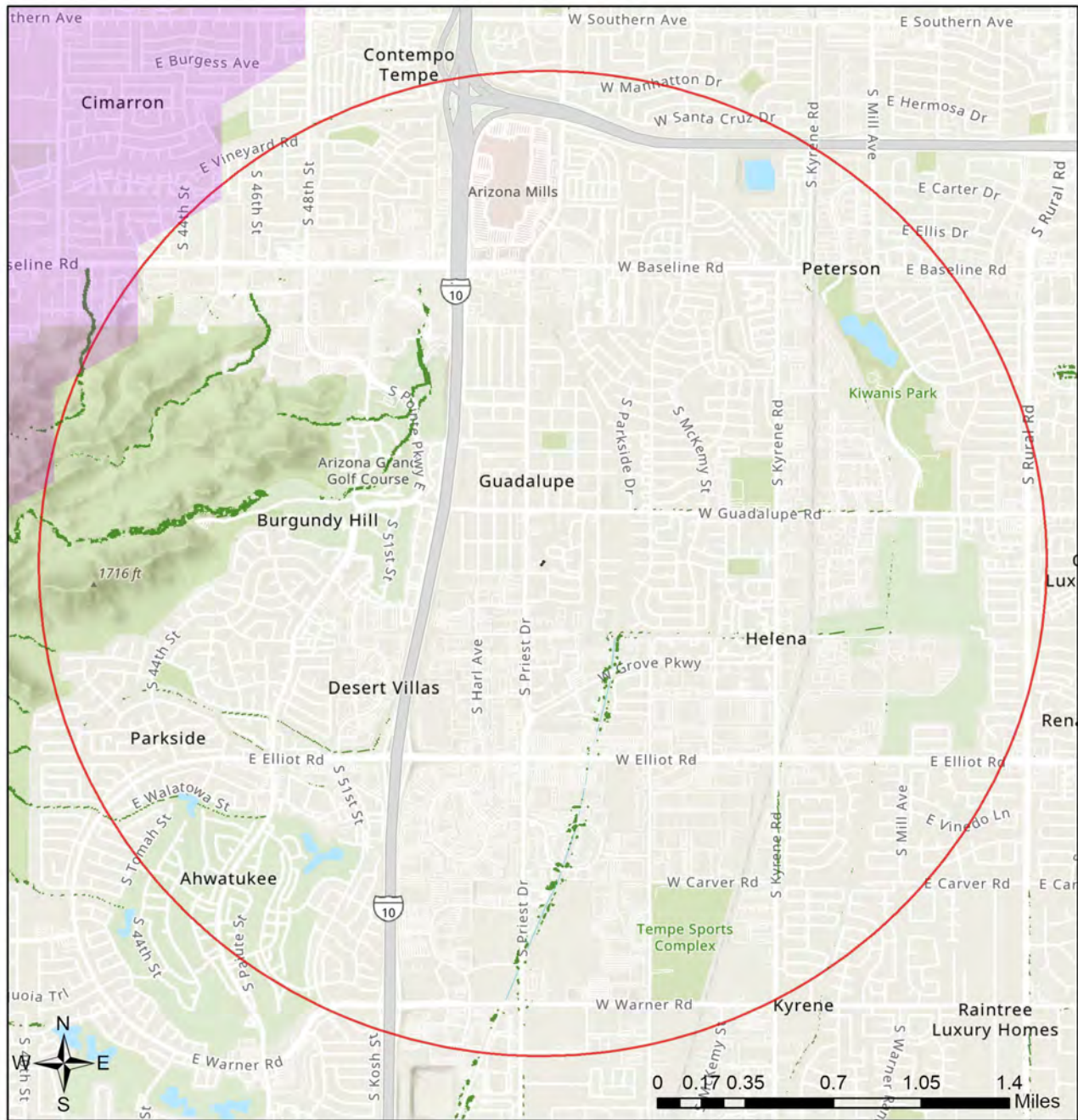


-  Buffered Project Boundary
-  Project Boundary

Project Size (acres): 0.02
Lat/Long (DD): 33.3606 / -111.9620
County(s): Maricopa
AGFD Region(s): Mesa
Township/Range(s): T1S, R4E
USGS Quad(s): GUADALUPE

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Native Networks Guadalupe Important Areas

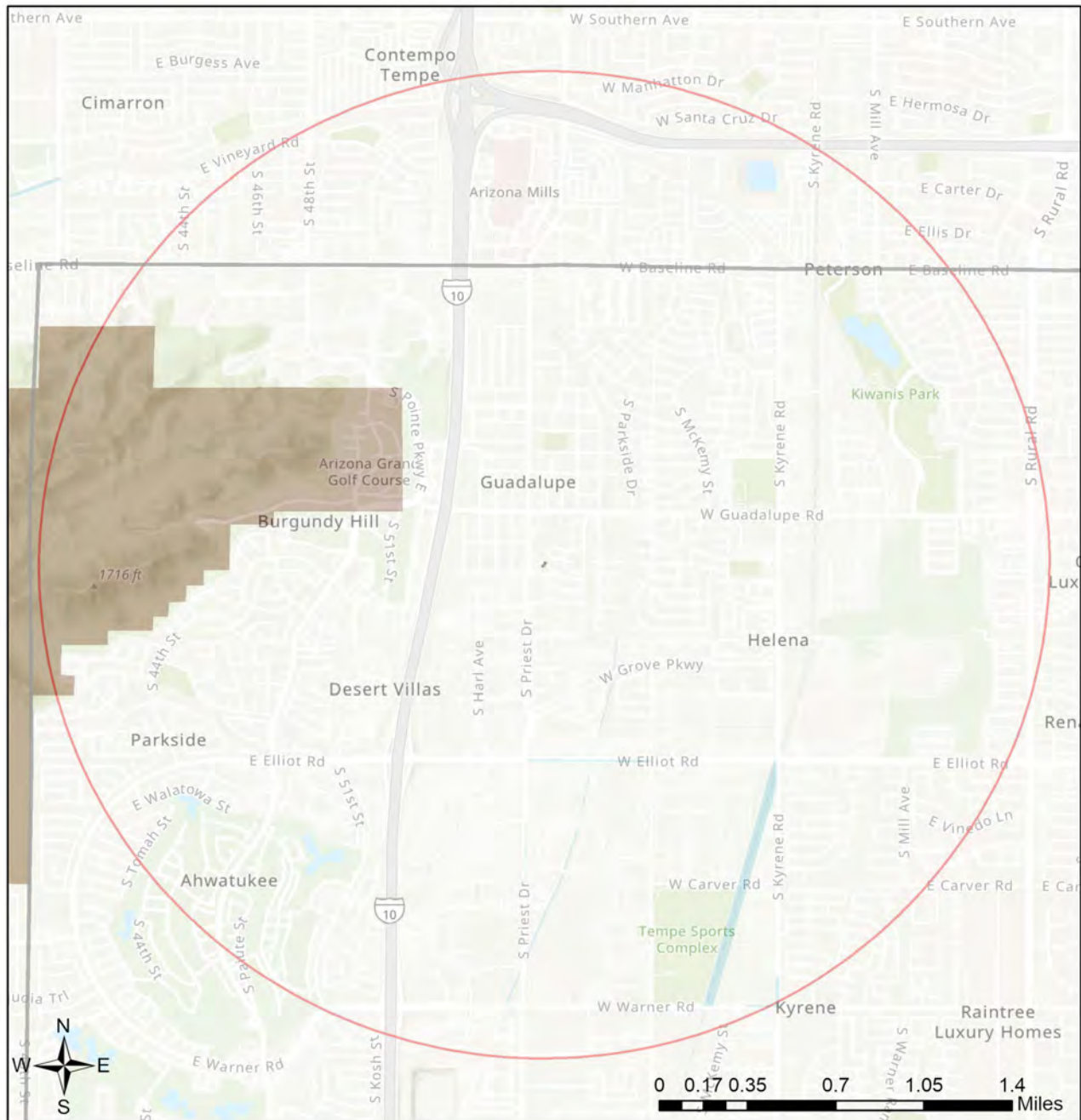


- Buffered Project Boundary
- Project Boundary
- Important Bird Areas
- Critical Habitat
- Pinal County Riparian
- Important Connectivity Zones
- Wildlife Connectivity

Project Size (acres): 0.02
 Lat/Long (DD): 33.3606 / -111.9620
 County(s): Maricopa
 AGFD Region(s): Mesa
 Township/Range(s): T1S, R4E
 USGS Quad(s): GUADALUPE

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Native Networks Guadalupe Township/Ranges and Land Ownership



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

Project Size (acres): 0.02
 Lat/Long (DD): 33.3606 / -111.9620
 County(s): Maricopa
 AGFD Region(s): Mesa
 Township/Range(s): T1S, R4E
 USGS Quad(s): GUADALUPE

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Special Status Species Documented within 2 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Ammospermophilus harrisi</i>	Harris' Antelope Squirrel					2
<i>Chaetodipus baileyi</i>	Bailey's Pocket Mouse					2
<i>Danaus plexippus</i>	Monarch	C		S		
<i>Lasiurus blossevillii</i>	Western Red Bat		S			2
<i>Perognathus amplus</i>	Arizona Pocket Mouse					2
<i>Poeciliopsis occidentalis occidentalis</i>	Gila Topminnow	LE		S		1
<i>Sauromalus ater</i>	Common Chuckwalla	SC				

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

No Special Areas Detected

No special areas were detected within the project vicinity.

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Athene cunicularia hypugaea</i>	Western Burrowing Owl		S	S		2
<i>Gopherus morafkai</i>	Sonoran Desert Tortoise		S	S		1
<i>Haliaeetus leucocephalus</i> (wintering pop.)	Bald Eagle - Winter Population		S	S		
<i>Poeciliopsis occidentalis occidentalis</i>	Gila Topminnow					1
<i>Psathyrotes ramosissima</i>	Velvet Brittle-stem					
<i>Sauromalus ater</i>	Common Chuckwalla					
<i>Sonorella superstitionis</i>	Superstition Mountains Talussnail					2

Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Callipepla gambelii</i>	Gambel's Quail					
<i>Zenaida asiatica</i>	White-winged Dove					
<i>Zenaida macroura</i>	Mourning Dove					

Project Type: Communication, Antenna and/or communication dish installation, Modification to existing structure

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, canted, 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).

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 U.S. Fish and Wildlife Service (Migratory Bird Treaty Act) may be required (<https://www.fws.gov/office/arizona-ecological-services>).



Marana Tower Site



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ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

August 1, 2023

Native Network, Inc.
250 East Penny Road
Wenatchee, WA 98801

Attention: Ms. Rebecca Carter

**Subject: Informal Biological Assessment
Proposed 75-Foot Tall Monopole Telecommunications Structure
(Overall Height Including Appurtenances)
Native Networks Site Marana
11720-11738 W Camino Pinos
Marana, Pima County, Arizona
Marana, AZ USGS Quadrangle Map
Latitude: N 32° 26' 48.2" W 111° 12' 55.6"
ECA Project Number: 23-001200**

To Ms. Carter:

Environmental Corporation of America (ECA) is assisting Native Network, Inc. with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

Based on the specifications of the proposed project, the information reviewed, and observations made during our site visit, ECA was able to make a "no effect" determination for the proposed undertaking. Therefore, consultation with the United States Fish and Wildlife Service (USFWS) would not be required. This Informal Biological Assessment (IBA) documents our findings with respect to federally listed or proposed threatened and endangered species at the project site.

Background

The project area location is shown on Figure 1. Figure 2 is a plan view that shows the site configuration. Figure 3 is a recent aerial photograph of the site area. Native Network plans to construct a 75-foot tall (overall height) monopole structure within the project area. The tower would not be lit and no guy wires would be used.

The project area would consist of a proposed 25-foot by 55-foot tower compound and a proposed approximately 85-foot long buried fiber route. The proposed tower compound area is located within an area of bare soil with a single palm tree at the eastern end of W Camino Pinos. The proposed fiber route is located within same cleared lot and extending south. The immediate

surrounding area is occupied by residential development, a vegetated swale feature, and cleared land. Descriptions of the photographs are provided underneath each photograph and photograph locations are graphically depicted on Figure 2.

Based on National Wetlands Inventory data, no wetlands or waters are mapped within the project area. During the site visit, no evidence of surface waters or the three criteria required for an area to be characterized as wetland was observed. Therefore, it does not appear that the project would result in impacts to wetlands or waters.

Purpose

The purpose of this letter is to provide you with documentation of our investigations and findings relative to federally listed or proposed threatened and endangered species within the project area.

Review of Available Documentation and Site Inspection

ECA has reviewed the USFWS Information for Planning and Consultation (IPaC) system species list for the project area and the USFWS Critical Habitat Mapper (see Attachment C). ECA has also reviewed information from various sources pertaining to the habitat requirements of the listed species. Habitat at the site was evaluated during a May 16, 2023 site visit, which was conducted by Shannon Lowman of ECA.

Discussion of Findings

Because the proposed undertaking would not result in impacts to surface waters or wetlands, aquatic species are not a concern for this undertaking. The nearest surface water is a canal located approximately 175 feet south of the proposed tower compound at its closest point. Non-aquatic species recognized by the USFWS as potentially occurring within the project area are listed in the table below along with a habitat description and a finding of effect for each. No designated critical habitat was identified within the project area.

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
Jaguar	<i>Panthera onca</i>	Endangered	Wide variety of situations, such as tropical and subtropical forests, lowland scrub and woodland, thorn scrub, pampas/llanos, desert, swampy savanna, mangrove swamps, lagoons, marshland, and floating islands of vegetation	No suitable habitat present; No Effect
Ocelot	<i>Leopardus</i> (= <i>Felis</i>) <i>pardalis</i>	Endangered	Habitats with good cover; when active by day, tends to keep hidden in dense brush; Inhabits dense chaparral thickets in Texas; Elsewhere, occurs in humid tropical forests, mangrove forests, swampy savannas, brushland, and riverine scrub in deserts	No suitable habitat present; No Effect
California least tern	<i>Sterna antillarum browni</i>	Endangered	Seacoasts, beaches, bays, estuaries, lagoons, lakes, and rivers during breeding; sandy beaches, mudflats, and salt-pond dikes when resting; shallow depression on level ground on sandy or gravelly beaches and banks of rivers or lakes with sparse or no vegetation during nesting	No suitable habitat present; No Effect

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
Yellow-billed cuckoo	<i>Coccyzus americanus</i>	Threatened	Open woodland (especially where undergrowth is thick), parks, deciduous riparian woodland; in the west, tall cottonwood and willow riparian woodland	No suitable habitat present; No Effect
Arizona eryngo	<i>Eryngium sparganophyllum</i>	Endangered	Occurs in riparian zones and marshes within Pinon-Juniper Woodland and Madrean Evergreen Woodland	No suitable habitat present; No Effect

The proposed tower compound area is located within an area of bare soil at the eastern end of W Camino Pinos. The proposed fiber route is located within same cleared lot and extending south. No suitable habitat was identified for any federally listed or proposed threatened or endangered species identified by USFWS as potentially occurring within the project area. A Tower Site Evaluation Form is attached.

Conclusions

Based on the information reviewed and the site inspection, ECA has found no evidence that the project area would provide suitable habitat for any federally listed or proposed species identified by USFWS as potentially occurring within the project area or that any designated or proposed critical habitat is present within the project vicinity. Based on these findings, the proposed undertaking would have no effect on any federally threatened or endangered species or designated critical habitat. Further, the proposed project would not jeopardize the continued existence of any federally proposed threatened or endangered species and would not result in the destruction or adverse modification of proposed critical habitat.

Closure


Shannon Lowman of ECA conducted the site visit and area inspection, and Ashley Bean collected the applicable information, and compiled this report. Ben Salter, a Principal Scientist at ECA, reviewed this report. Mr. Salter's resume is included in Attachment E.

We appreciate the opportunity to provide you with these professional services. For any questions or additional information, please contact Ashley Bean by phone at 828-505-0755, by email at ashley.bean@eca-usa.com, or by mail at 1340 Patton Avenue, Suite K, Asheville, North Carolina, 28806.

Sincerely yours,
Environmental Corporation of America



Ashley Bean
Project Manager



Ben Salter
Principal Scientist

ATTACHMENT C

Protected Species Information



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Arizona Ecological Services Field Office
9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517
Phone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer To:
Project Code: 2023-0087556
Project Name: 23-001200

May 31, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that *may* occur within the One-Range that has been delineated for the species (candidate, proposed, or listed) and its critical habitat (designated or proposed) with which your project polygon intersects. These range delineations are based on biological metrics, and do not necessarily represent exactly where the species is located. Please refer to the species information found on ECOS to determine if suitable habitat for the species on your list occurs in your project area.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If the Federal action agency determines that listed species or critical habitat *may be affected* by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

or habitat segment may be affected. The effects analysis should include the entire action area, which often extends well outside the project boundary or "footprint." For example, projects that involve streams and river systems should consider downstream affects. If the Federal action agency determines that the action may jeopardize a *proposed* species or may adversely modify *proposed* critical habitat, the agency must enter into a section 7 conference. The agency may choose to confer with us on an action that may affect proposed species or critical habitat.

Candidate species are those for which there is sufficient information to support a proposal for listing. Although candidate species have no legal protection under the Act, we recommend that they be considered in the planning process in the event they become proposed or listed prior to project completion. More information on the regulations (50 CFR 402) and procedures for section 7 consultation, including the role of permit or license applicants, can be found in our Endangered Species Consultation Handbook at: <https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>.

We also advise you to consider species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668 *et seq.*). The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when authorized by the Service. The Eagle Act prohibits anyone, without a permit, from taking (including disturbing) eagles, and their parts, nests, or eggs. Currently 1,026 species of birds are protected by the MBTA, including the western burrowing owl (*Athene cunicularia hypugaea*). Protected western burrowing owls can be found in urban areas and may use their nest/burrows year-round; destruction of the burrow may result in the unpermitted take of the owl or their eggs.

If a bald eagle or golden eagle nest occurs in or near the proposed project area, our office should be contacted for Technical Assistance. An evaluation must be performed to determine whether the project is likely to disturb or harm eagles. The National Bald Eagle Management Guidelines provide recommendations to minimize potential project impacts to bald eagles (see <https://www.fws.gov/law/bald-and-golden-eagle-protection-act> and <https://www.fws.gov/program/eagle-management>).

The Division of Migratory Birds (505/248-7882) administers and issues permits under the MBTA and Eagle Act, while our office can provide guidance and Technical Assistance. For more information regarding the MBTA, BGEPA, and permitting processes, please visit the following web site: <https://www.fws.gov/program/migratory-bird-permit>. Guidance for minimizing impacts to migratory birds for communication tower projects (e.g. cellular, digital television, radio, and emergency broadcast) can be found at <https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation>.

The U.S. Army Corps of Engineers (Corps) may regulate activities that involve streams (including some intermittent streams) and/or wetlands. We recommend that you contact the Corps to determine their interest in proposed projects in these areas. For activities within a National Wildlife Refuge, we recommend that you contact refuge staff for specific information about refuge resources, please visit [this link](#) or visit <https://www.fws.gov/program/national->

[wildlife-refuge-system](#) to locate the refuge you would be working in or around.

If your action is on tribal land or has implications for off-reservation tribal interests, we encourage you to contact the tribe(s) and the Bureau of Indian Affairs (BIA) to discuss potential tribal concerns, and to invite any affected tribe and the BIA to participate in the section 7 consultation. In keeping with our tribal trust responsibility, we will notify tribes that may be affected by proposed actions when section 7 consultation is initiated. For more information, please contact our Tribal Coordinator, John Nystedt, at 928/556-2160 or John.Nystedt@fws.gov.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. Information on known species detections, special status species, and Arizona species of greatest conservation need, such as the western burrowing owl and the Sonoran desert tortoise (*Gopherus morafkai*) can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program (<https://www.azgfd.com/wildlife/planning/projevalprogram/>).

We appreciate your concern for threatened and endangered species. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office. If we may be of further assistance, please contact our Flagstaff office at 928/556-2118 for projects in northern Arizona, our general Phoenix number 602/242-0210 for central Arizona, or 520/670-6144 for projects in southern Arizona.

Sincerely,
/s/

Heather Whitlaw
Field Supervisor
Attachment

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
 - Wetlands
-

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arizona Ecological Services Field Office

9828 North 31st Ave

#c3

Phoenix, AZ 85051-2517

(602) 242-0210

PROJECT SUMMARY

Project Code: 2023-0087556
Project Name: 23-001200
Project Type: Communication Tower New Construction
Project Description: Monopole Tower
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.446861,-111.21538007045649,14z>



Counties: Pima County, Arizona

ENDANGERED SPECIES ACT SPECIES

There is a total of 8 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Jaguar <i>Panthera onca</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3944	Endangered
Ocelot <i>Leopardus (=Felis) pardalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4474	Endangered
Sonoran Pronghorn <i>Antilocapra americana sonoriensis</i> Population: U.S.A. (AZ), Mexico No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4750	Experimental Population, Non- Essential

BIRDS

NAME	STATUS
California Least Tern <i>Sterna antillarum browni</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8104	Endangered
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

REPTILES

NAME	STATUS
Sonoyta Mud Turtle <i>Kinosternon sonoriense longifemorale</i> There is final critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/7276	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

FLOWERING PLANTS

NAME	STATUS
Arizona Eryngo <i>Eryngium sparganophyllum</i> Population: There is final critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/10705	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

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1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\) list](#) or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bendire's Thrasher <i>Toxostoma bendirei</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9435	Breeds Mar 15 to Jul 31
Costa's Hummingbird <i>Calypte costae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9470	Breeds Jan 15 to Jun 10

NAME	BREEDING SEASON
<p>Gila Woodpecker <i>Melanerpes uropygialis</i></p> <p>This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5960</p>	Breeds Apr 1 to Aug 31
<p>Gilded Flicker <i>Colaptes chrysoides</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2960</p>	Breeds May 1 to Aug 10
<p>Lawrence's Goldfinch <i>Carduelis lawrencei</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9464</p>	Breeds Mar 20 to Sep 20
<p>Long-eared Owl <i>asio otus</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3631</p>	Breeds Mar 1 to Jul 15
<p>Marbled Godwit <i>Limosa fedoa</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481</p>	Breeds elsewhere
<p>Willet <i>Tringa semipalmata</i></p> <p>This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds elsewhere

PROBABILITY OF PRESENCE SUMMARY

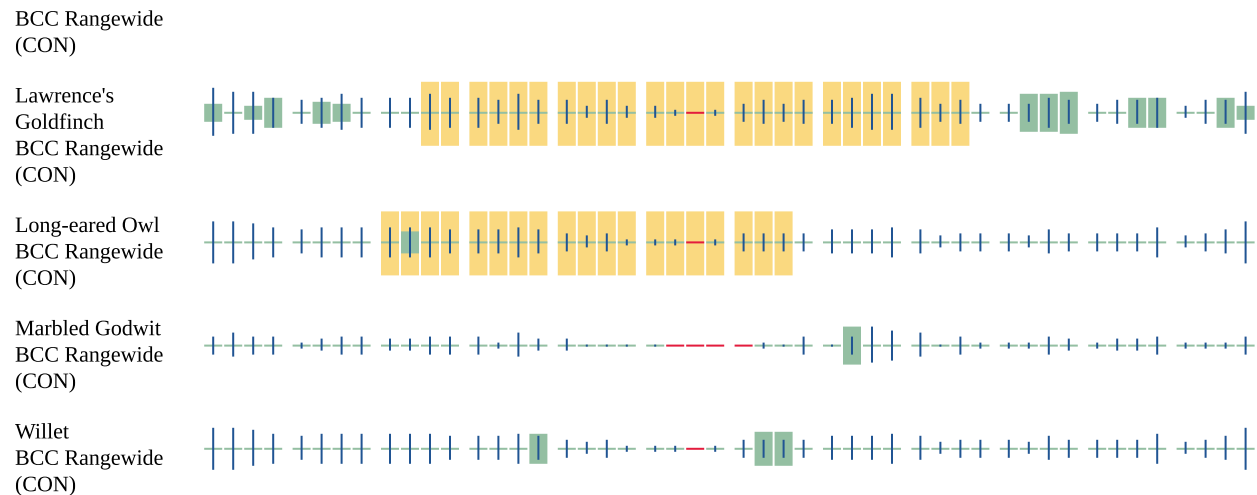
The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#)

requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America

Name: Ryan Edson

Address: 1375 Union Hill Industrial Ct.

City: Alpharetta

State: GA

Zip: 30004

Email: ryan.edson@eca-usa.com

Phone: 7706672040

Critical Habitat for Threatened & Endangered Species [USFWS]



A specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

ATTACHMENT D

Tower Site Evaluation Form

TOWER SITE EVALUATION FORM

1. Location (Provide maps if possible):

State: AZ County: Pima

Latitude/Longitude/GPS Grid: N 32° 26' 48.2" W 111° 12' 55.6"

Directions: From Marana AZ: Head north on N Whitney Lane toward W Swanson Street. Turn right to stay on N Whitney Lane. Turn right onto W Moore Road. Turn left onto N Sandario Road. Turn right onto W Rosario Road. Continue onto W Camino Pinos. The destination will be on the left.

2. Elevation above mean sea level: ~1,990 feet

3. Will the equipment be co-located on an existing **FCC licensed tower** or other existing structure (building, billboard, etc.)? (y/n) No If yes, type of structure: _____

If yes, no further information is required.

4. If no, provide proposed specifications for new tower:

Height: 75' Construction type (lattice, monopole, etc.): Monopole

Guy-wired? (y/n) No No. Bands: NA Total No. Wires: NA

Lighting (Security & Aviation): NA

If tower will be lighted or guy-wired, complete items 5-19. If not, complete only items 19 and 20.

5. Area of tower footprint in acres or square feet: _____

6. Length and width of access road in feet: _____

7. General description of terrain – mountainous, rolling hills flat to undulation, etc. Photographs of the site and surrounding area are beneficial:

8. Meteorological conditions (incidence of fog, low ceilings, etc.): _____

9. Soil type(s): _____

10. Habitat types and land use on and adjacent to the site, by acreage and percentage of total:

11. Dominant vegetative species in each habitat: _____

12. Average diameter breast height of dominant tree species in forested areas: _____

13. Will construction at this site cause fragmentation of a larger block of habitat into two or more smaller blocks? (y/n) _____ If yes, describe: _____

14. Is evidence of birds roosts or rookeries present? (y/n) _____ If yes, describe: _____

15. Distance to nearest wetland area (forested swamp, march, riparian, marine, etc.), and coastline if applicable: _____
16. Distance to nearest telecommunications tower: _____
17. Potential for co-location of antennas on existing towers or other structures: _____
18. Have measures been incorporated to minimizing impacts to migratory birds? (y/n) _____
19. Has an evaluation been made to determine if proposed facility may affect listed or proposed endangered or threatened species or their habitat as required by FCC regulation at 47 CFR 1.1307(a)(3)? (y/n) Yes If, yes present findings: _____ No effect for all listed or proposed species
20. Additional information required:

ATTACHMENT E

Resume



Ben Salter, PWS

Vice President of Environmental and Ecological Services/Principal Scientist
1340 Patton Avenue, Suite K, Asheville, NC 28806
(828) 505-0755
ben.salter@eca-usa.com

EDUCATION

Western Carolina University

Master of Science, Biology, August 2004

Cullowhee, NC

Georgia College & State University

Bachelor of Science, Biology, December 1998
Chemistry Minor

Milledgeville, GA

Short Courses/Specialized Training

OSHA HAZWOPER, 40-hour, 2016
Asbestos Building Inspector, 2015
Tennessee Hydrologic Determination Training Course, 2014
Applying the NEPA Process and Writing Effective NEPA Documents, 2013
Interagency Coordination for Endangered Species, 2013
NEPA Cumulative Effects Analysis, 2013
SonoBat Workshop, 2013
Overview of NHPA Section 106, 2013
GA DOT Coastal Wetland Plant Identification w/ Dr. Bob Mohlenbrock, 2010
Airports Council International – North American NEPA Workshop, 2009
NC State Stream Restoration Design Principles, 2007
Rosgen Level 1 – Applied Fluvial Geomorphology, 2006
VDEQ Stream Impact and Compensation Assessment Manual Workshop, 2006
VIMS Perennial Stream Workshop, 2005

PROFESSIONAL REGISTRATIONS

Society of Wetland Scientists, Professional Wetland Scientist, 2012 to present
EPA AHERA-Accredited Asbestos Building Inspector, 1999 to 2002; 2015 to present

PROFESSIONAL EXPERIENCE

November 2007 – Present

Environmental Corporation of America

Asheville, NC

Position: Principal Scientist, Vice President of Environmental and Ecological Services

Responsibilities:

Technical Compliance Lead and Manager of ECA Environmental Team and Services including Phase I and II ESA, NEPA, T&E Species and Migratory Bird Assessment/Consultation, and Wetlands/Waters delineation and permitting; Responsible for client management, staff development, final QA/QC review, and overall success, efficiency, and technical/regulatory oversight for managed services.

April 2006 – November 2007

Blue Ridge Ecological

Waynesville, NC

Position: Principal Scientist, Partner

Responsibilities:

Partner/Principal Scientist in natural resource management firm focused on fisheries/lake management, watershed assessment, water quality monitoring, and biological assessment.

January 2005 – November 2007

Malcolm Pirnie, Inc.

Newport News, VA

Position: Project Environmental Scientist

Responsibilities:

Wetland and Stream Scientist, National Environmental Policy Act Specialist, and Environmental Scientist; Primary responsibilities included EA and EIS writer, wetland and stream field scientist, and environmental site assessor.

August 2002 – December 2004 **Western Carolina University** Cullowhee, NC
Position: Research and Teaching Assistant
Responsibilities:
Fisheries Scientist and Biology/Ecology Laboratory Instructor

May 2003 – September 2003 **United States Forest Service** Asheville, NC
Position: Biological Science Technician
Responsibilities:
Fisheries scientist for southern Appalachian brook trout project. Collected brook trout tissue samples in headwater streams throughout Western North Carolina and conducted genetic analysis for determining origin.

January 1999 – May 2002 **Environmental Corporation of America** Alpharetta, GA
Position: Project Scientist/Manager
Responsibilities:
Project manager for environmental projects including Phase I and II Environmental Assessments, FCC NEPA assessment, asbestos and lead-based paint inspection, and abatement monitoring and specification preparation, cultural resource assessments, threatened and endangered species surveys, wetland delineation, groundwater monitoring and remediation system installation, geotechnical investigation, construction materials testing, and telecommunications tower construction plan review.

JOURNAL PUBLICATIONS

Miller, JR, **EB Salter**, JB Anderson, PJ Lechler, SL Kondrad, PF Galbreath. 2005. Influence of Temporal Variations in Water Chemistry on the Pb Isotopic Compositions of Rainbow Trout (*Oncorhynchus mykiss*). *Science of the Total Environment*, 350, p. 204-224.

REPRESENTATIVE EXPERIENCE

Wetland/Waters Delineation and Section 404/401 Permitting

Project/Field Scientist and Principal Scientist involvement in wetland/waters delineations and assessments and associated Section 404/401 (Nationwide and Individual Permits), CZMA, and local permitting for projects in over 20 states; Regulatory Lead and staff management in support of all company wetlands/waters related services for the past 10 years.

Phase I and II ESA, Hazardous Remediation/Waste Handling, and Health and Safety Compliance

Qualified Environmental Professional per 40 CFR 312.10(b); Project Scientist/Manager and Principal Scientist involvement in Phase I and II ESAs throughout the nation on a variety of property types including commercial, industrial, municipal, government, communications, and residential facilities, and large undeveloped tracts; Field Staff and Technical Lead for field execution, scoping, and regulatory compliance related to Phase II ESA and coordination of remediation of impacted soil and associated waste disposal and handling as necessary; Primary Phase II and waste disposal and handling experience with existing and proposed communications facilities but with involvement at commercial, industrial, residential, and fuel station/automotive facilities; Technical Lead for preparation of Health and Safety Plans and impacted media management plans for communications facilities across the nation.

National Environmental Policy Act Evaluation/Documentation

Project Manager, Principal Scientist, and lead agency/stakeholder liaison for NEPA related services nationwide for numerous lead federal agencies; Involvement with EIS, EA, Categorical Exclusions, and Feasibility Studies; Expert FCC NEPA Scientist with over 20 years in the communications industry; Commonly works with a prominent Native American Indian Tribe in the Southeast to prepare NEPA documentation for projects located on Tribal-owned lands.

Threatened and Endangered Species and Migratory Bird Evaluation/Consultation

Project and Principal level involvement in thousands of T&E species evaluations and consultations with the USFWS and State Wildlife Agencies including technical assistance, programmatic agreement, self-certification, informal, and formal consultations; Field and Principal level participation in hundreds of migratory bird nest evaluations at communications facilities to ensure compliance with the Migratory Bird Treaty Act; Technical Compliance/Regulatory Lead and staff management in support of all company T&E and migratory bird-related services.

Ryan Edson

From: cboucher@azgfd.gov on behalf of Project Evaluation Program - Game and Fish <pep@azgfd.gov>
Sent: Tuesday, August 15, 2023 7:49 PM
To: Ryan Edson
Subject: Re: Project Evaluation Requests

Hi Ryan,

As the proposed project is located in a previously disturbed area, with the present habitat providing relatively low value to wildlife, the Department does not anticipate any significant adverse impacts to wildlife resources would occur as a result of this project.

This email serves as our official response.

Thank you for the opportunity to review this project.

If you have any questions regarding this letter, please feel free to contact me.

CHERI BOUCHÉR | PROJECT EVALUATION PROGRAM SPECIALIST
ARIZONA GAME AND FISH DEPARTMENT

OFFICE: 623-236-7615

EMAIL: cboucher@azgfd.gov

azgfd.gov | 5000 W. Carefree Highway, Phoenix, AZ 85086

Join our new [Conservation Membership](#) program and ensure a wildlife legacy for the future.

On Wed, Jun 28, 2023 at 11:28 AM Ryan Edson <ryan.edson@eca-usa.com> wrote:

Hello,

Please see the attached project evaluation request for sites within Pima, Pinal, and Maricopa counties.

Thanks!

Ryan Edson (he/him)

Client Manager/Senior NEPA Specialist

Environmental Corporation of America (ECA)

678-477-4509 (Mobile/Remote)

ryan.edson@eca-usa.com

www.eca-usa.com



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

June 28, 2023

Arizona Department of Game and Fish
Project Evaluation Program
5000 W. Carefree Highway
Phoenix, AZ 85086-5000

Attention: Ms. Ginger Ritter
Project Evaluation Supervisor

Subject: Proposed 70-Foot Monopole Telecommunications Structure
Native Networks Site Marana
11720-11738 W Camino Pinos
Marana, Pima County, Arizona
Latitude: N 32° 26' 48.2" Longitude: W 111° 12' 55.6"
ECA Project Number: 23-001200

Dear Ms. Ritter:

Environmental Corporation of America (ECA) is assisting Native Networks with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

The purpose of this letter is to request Arizona Game and Fish Department (AGF) comments relative to the potential effects of the proposed project on sensitive natural resources. ECA has utilized the Arizona On-line Environmental Review Tool and has completed a Project Evaluation Request Form. The generated report, completed form, and figures and photographs for the proposed project are attached to this letter.

For any questions or to request additional information, please contact Ryan Edson by phone at 770-667-2040, by email at ryan.edson@eca-usa.com, or by mail at 1375 Union Hill Industrial Court, Alpharetta, GA 30040.

Sincerely yours,
Environmental Corporation of America

A handwritten signature in black ink that reads 'Ryan Edson'.

Ryan Edson
Project Manager

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:

Native Networks Marana

User Project Number:

23-0012000

Project Description:

Proposed 70-foot monopole telecommunications tower

Project Type:

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

Contact Person:

Ryan Edson

Organization:

ECA

On Behalf Of:

OTHER_FED

Project ID:

HGIS-19419

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. Arizona Wildlife Conservation Strategy (AWCS), specifically Species of Greatest Conservation Need (SGCN), 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

Native Networks Marana

USA Topo Basemap With Locator Map



-  Buffered Project Boundary
-  Project Boundary

Project Size (acres): 0.02

Lat/Long (DD): 32.4467 / -111.2154

County(s): Pima

AGFD Region(s): Tucson

Township/Range(s): T11S, R11E

USGS Quad(s): MARANA



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



Native Networks Marana

Web Map As Submitted By User

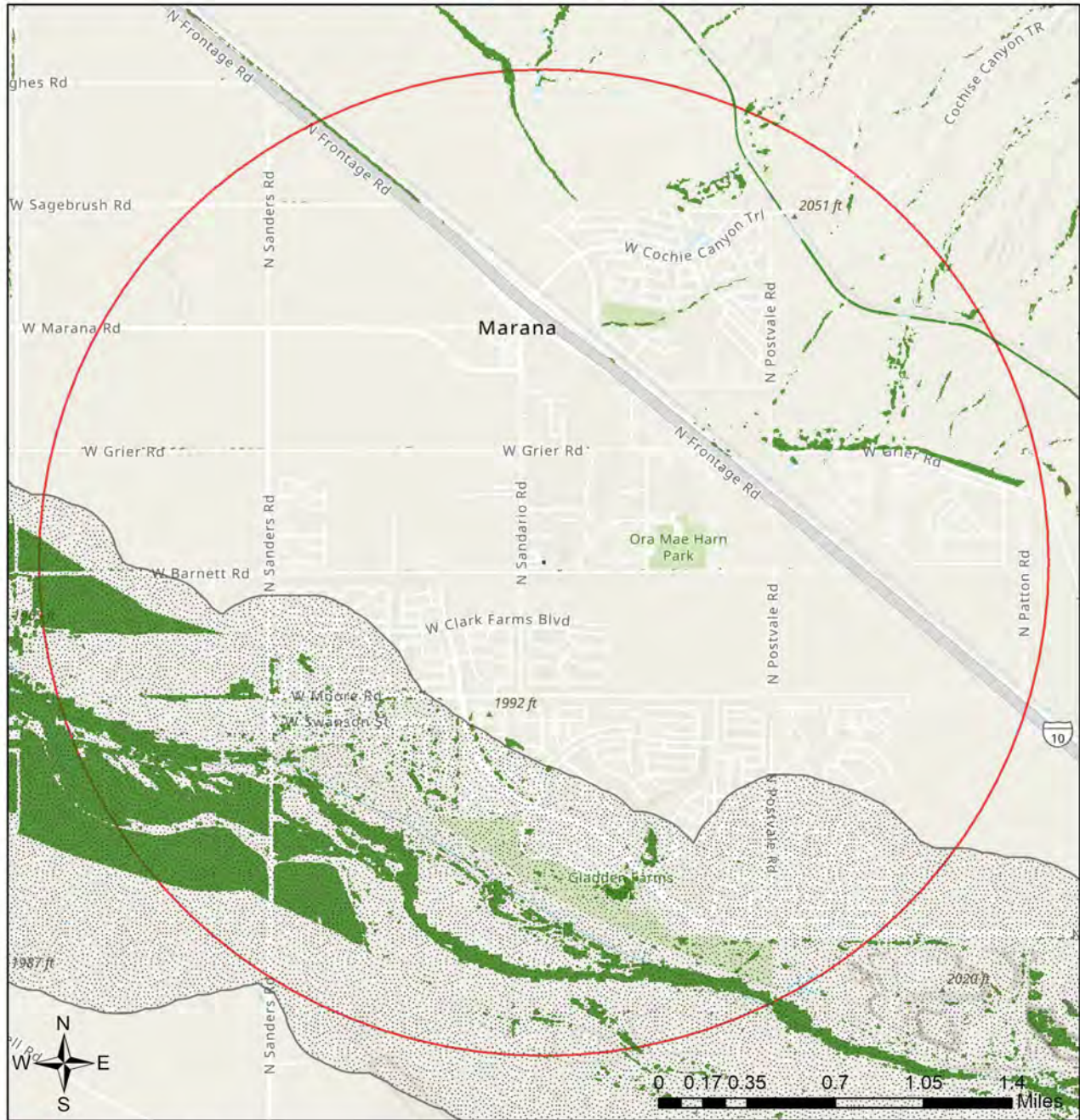


-  Buffered Project Boundary
-  Project Boundary

Project Size (acres): 0.02
Lat/Long (DD): 32.4467 / -111.2154
County(s): Pima
AGFD Region(s): Tucson
Township/Range(s): T11S, R11E
USGS Quad(s): MARANA

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

Native Networks Marana Important Areas

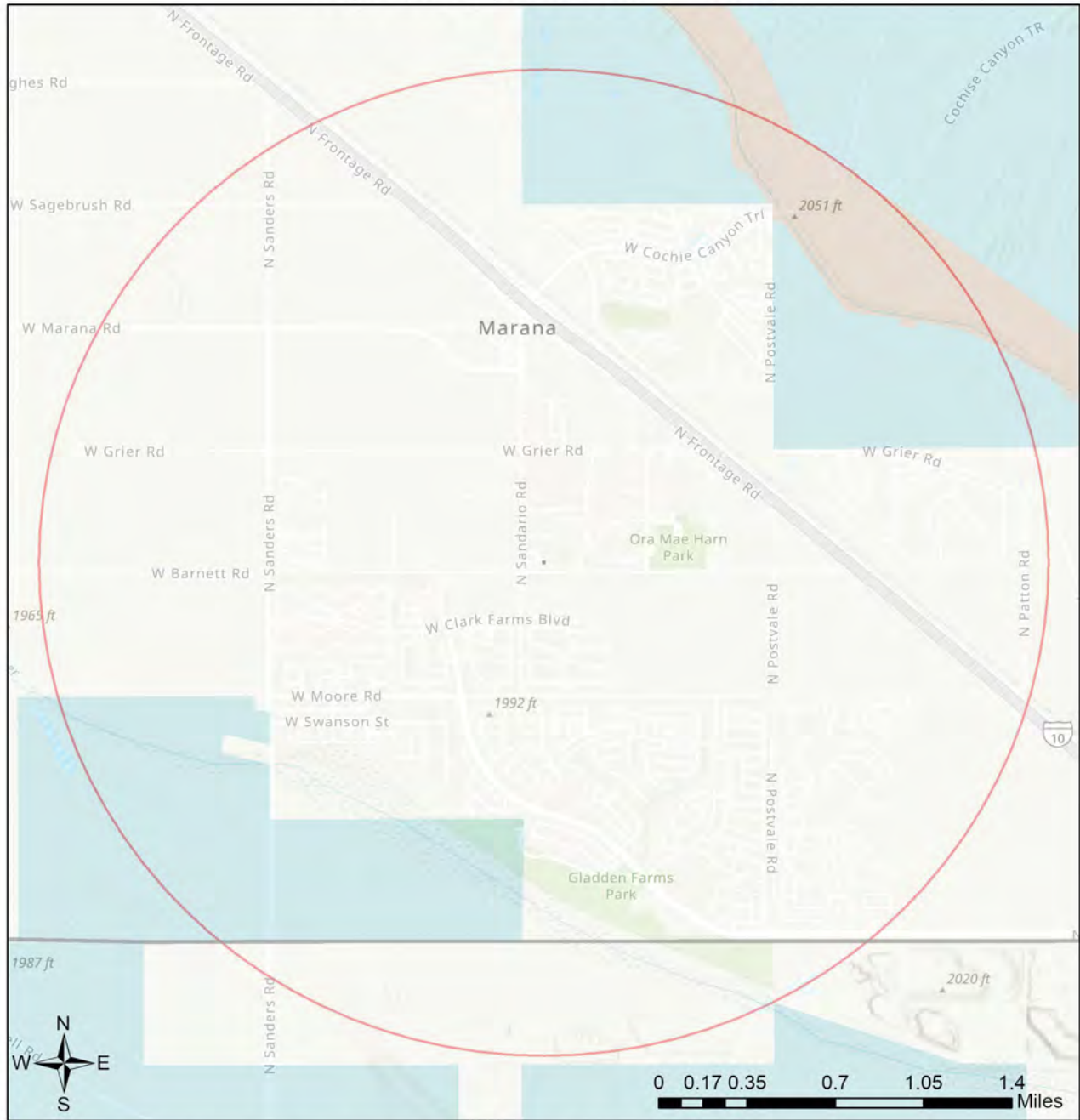


- Buffered Project Boundary
- Project Boundary
- Important Bird Areas
- Critical Habitat
- Pinal County Riparian
- Important Connectivity Zones
- Wildlife Connectivity

Project Size (acres): 0.02
 Lat/Long (DD): 32.4467 / -111.2154
 County(s): Pima
 AGFD Region(s): Tucson
 Township/Range(s): T11S, R11E
 USGS Quad(s): MARANA

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Native Networks Marana Township/Ranges and Land Ownership



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

Project Size (acres): 0.02
 Lat/Long (DD): 32.4467 / -111.2154
 County(s): Pima
 AGFD Region(s): Tucson
 Township/Range(s): T11S, R11E
 USGS Quad(s): MARANA

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NIMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Special Status Species Documented within 2 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Aspidoscelis sonorae	Sonoran Spotted Whiptail					2
Athene cucularia hypugaea	Western Burrowing Owl	SC	S	S		2
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S	S		1
Glaucidium brasilianum cactorum	Cactus Ferruginous Pygmy-owl	PT	S	S		1
Incilius alvarius	Sonoran Desert Toad					2
Melospiza aberti	Abert's Towhee		S			2
Sigmodon ochrognathus	Yellow-nosed Cotton Rat	SC				3

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

No Special Areas Detected

No special areas were detected within the project vicinity.

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Athene cucularia hypugaea	Western Burrowing Owl		S	S		2
Bat Foraging Area	High Netting Concentration					
Chionactis annulata	Resplendent Shovel-nosed Snake					
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)		S	S		1
Coleonyx variegatus	Western Banded Gecko					
Glaucidium brasilianum cactorum	Cactus Ferruginous Pygmy-owl		S	S		1
Gopherus morafkai	Sonoran Desert Tortoise		S	S		1
Heloderma suspectum	Gila Monster					1
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					2
Parabuteo unicinctus	Harris's Hawk					2
Sigmodon ochrognathus	Yellow-nosed Cotton Rat					3

Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
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, canted, 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 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. See the Arizona Department of Agriculture website for a list of prohibited and restricted noxious weeds at <https://www.invasivespeciesinfo.gov/unitedstates/az.shtml> and the Arizona Native Plant Society <https://aznps.com/invas> for recommendations on how to control. To view a list of documented invasive species or to report invasive species in or near your project area visit iMapInvasives - a national cloud-based application for tracking and managing invasive species at <https://imap.natureserve.org/imap/services/page/map.html>.

- To build a list: zoom to your area of interest, use the identify/measure tool to draw a polygon around your area of interest, and select "See What's Here" for a list of reported species. To export the list, you must have an account and be logged in. You can then use the export tool to draw a boundary and export the records in a csv file.

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 (<https://azstateparks.com/>).

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

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 **Listed, Proposed, or Candidate** species or **Critical Habitat** (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at <https://www.fws.gov/office/arizona-ecological-services> or:

Phoenix Main Office

9828 North 31st Avenue #C3
Phoenix, AZ 85051-2517
Phone: 602-242-0210
Fax: 602-242-2513

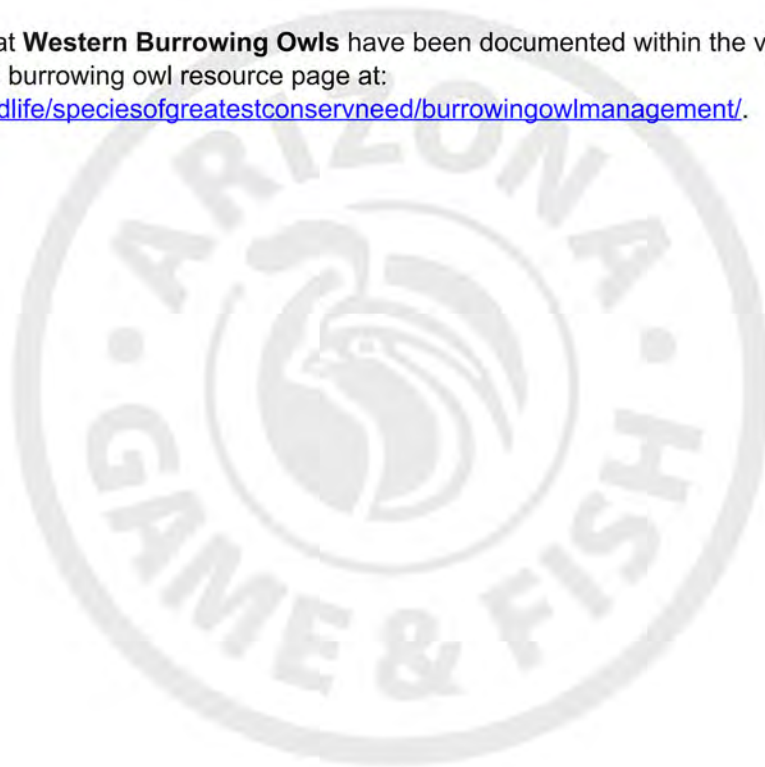
Tucson Sub-Office

201 N. Bonita Suite 141
Tucson, AZ 85745
Phone: 520-670-6144
Fax: 520-670-6155

Flagstaff Sub-Office

SW Forest Science Complex
2500 S. Pine Knoll Dr.
Flagstaff, AZ 86001
Phone: 928-556-2157
Fax: 928-556-2121

HDMS records indicate that **Western Burrowing Owls** have been documented within the vicinity of your project area. Please review the western burrowing owl resource page at:
<https://www.azgfd.com/wildlife/speciesofgreatestconservneed/burrowingowlmanagement/>.



Project Evaluation Request
Arizona Game and Fish Department

Notice: In order to obtain a review of your project, we require all of the information requested on this form to be provided. This review is free of charge. However, due to staff and budgetary constraints, we ask you to submit this form early in the process, as estimated turn around time is 30 days (if you need this review in less than 30 days, please include a needed by date and we will try to accommodate your request). This request is a preliminary review and further project review should include draft documents and a letter formally requesting further environmental review.

Project Evaluation Objectives:

Habitat Evaluation incorporates fish and wildlife resource needs or features in land and water development projects and land and water management planning efforts in Arizona.

Habitat Protection ensures habitat protection through environmental compliance and regulation, and to monitor the implementation and effectiveness of mitigation commitments for various land and water development projects and management planning activities in Arizona.

Instructions:

The following is required to process the request

- Completed form
- Map(s) delineating the project area (preferably a USGS quadrangle map)
- Relevant attachments (other supportive documents, photographs, etc.)

Send to:

Arizona Game and Fish Department
 Project Evaluation Program, WMHB
 5000 W Carefree Highway
 Phoenix, Arizona 85086
 Fax: 623-236-7366
 Email: PEP@azgfd.gov

Proposed Project Information

Project Name and/or Identification Number:

Date of Request:

What is the proposed date you intend to begin work on the project?

Applicant Requesting Project Evaluation

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Individual/Organization/Agency Proposing Project (if different from above)

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Location of Proposed Project *Remember to attach a topographic and/or plat map delineating the project area*

County(ies):

Township(s):

Range(s):

Section(s):

Proposed Project Information (continued)

Please briefly describe the project and project activities.

Briefly describe current land uses and habitat types in the project area.

List any waterbodies such as rivers, intermittent streams, lakes, or wetlands within or near the project area. Xeric washes should also be described, along with any anticipated impacts as a result of the project.

List any reports that have been prepared to describe the habitat that will be affected by the proposed project (e.g. habitat reconnaissance surveys, wetland delineation, etc.)

List any other resources or reviews that relate to the proposed project (correspondence, other phases of the project, other alternatives, etc.)

List any permits, licenses, or regulatory approvals you have or plan on applying for, or have already received as part of this project.

Return as hard copy to AZ Game & Fish Dept., Project Evaluation Program-Habitat Branch, 5000 W Carefree Highway, Phoenix, AZ 85086 or via email to pep@azgfd.gov or fax 623-236-7366

Milagros Tower Site



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

July 31, 2023

U.S. Department of Commerce
National Telecommunications & Information Administration
1401 Constitution Avenue NW
Washington, DC 20230

Attention: Mr. Josh Fitzpatrick

**Subject: Informal Biological Assessment
Proposed 70-Foot Tall Monopole Telecommunications Structure
(Overall Height Including Appurtenances)
Native Networks Site Milagros
Off W 44th Street
Tucson, Pima County, Arizona
Tucson, AZ USGS Quadrangle Map
Latitude: N 32° 11' 5.6" W 110° 59' 1.6"
ECA Project Number: 23-001190**

Mr. Fitzpatrick:

Environmental Corporation of America (ECA) is assisting Native Network, Inc with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

Based on the specifications of the proposed project, the information reviewed, and observations made during our site visit, ECA was able to make a "no effect" determination for the proposed undertaking. Therefore, consultation with the United States Fish and Wildlife Service (USFWS) would not be required. This Informal Biological Assessment (IBA) documents our findings with respect to federally listed or proposed threatened and endangered species at the project site.

Background

The project area location is shown on Figure 1. Figure 2 is a plan view that shows the site configuration. Figure 3 is a recent aerial photograph of the site area. Native Network plans to construct a 70-foot tall (overall height) monopole structure within the project area. The tower would not be lit and no guy wires would be used.

The project area would consist of a proposed 40-foot by 40-foot tower compound and a proposed approximately 100-foot long fiber run. The proposed tower compound is located within an area of bare soil and piles of soil and concrete adjacent to I-19 and on a larger parcel occupied by

Capilla del Senor de los Milagros church. The proposed fiber run is located within same cleared lot and extends into a narrow grassed/treed strip to north which lies between the western end of W 44th Street and I-19. Descriptions of the photographs are provided underneath each photograph and photograph locations are graphically depicted on Figure 2.

Based on National Wetlands Inventory data, no wetlands or waters are mapped within the project area. During the site visit, no evidence of surface waters or the three criteria required for an area to be characterized as wetland was observed. Therefore, it does not appear that the project would result in impacts to wetlands or waters.

Purpose

The purpose of this letter is to provide you with documentation of our investigations and findings relative to federally listed or proposed threatened and endangered species within the project area.

Review of Available Documentation and Site Inspection

ECA has reviewed the USFWS Information for Planning and Consultation (IPaC) system species list for the project area and the USFWS Critical Habitat Mapper (see Attachment C). ECA has also reviewed information from various sources pertaining to the habitat requirements of the listed species. Habitat at the site was evaluated during a May 16-18, 2023 site visit, which was conducted by Shannon Lowman of ECA.

Discussion of Findings

Because the proposed undertaking would not result in impacts to surface waters or wetlands, aquatic species are not a concern for this undertaking. The nearest surface water is a canal located approximately 1,545 feet north of the proposed tower compound at its closest point. Non-aquatic species recognized by the USFWS as potentially occurring within the project area are listed in the table below along with a habitat description and a finding of effect for each. No designated critical habitat was identified within the project area.

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
Jaguar	<i>Panthera onca</i>	Endangered	Wide variety of situations, such as tropical and subtropical forests, lowland scrub and woodland, thorn scrub, pampas/llanos, desert, swampy savanna, mangrove swamps, lagoons, marshland, and floating islands of vegetation	No suitable habitat present; No Effect
Ocelot	<i>Leopardus (=Felis) pardalis</i>	Endangered	Habitats with good cover; when active by day, tends to keep hidden in dense brush; Inhabits dense chaparral thickets in Texas; Elsewhere, occurs in humid tropical forests, mangrove forests, swampy savannas, brushland, and riverine scrub in deserts	No suitable habitat present; No Effect
California least tern	<i>Sterna antillarum browni</i>	Endangered	Seacoasts, beaches, bays, estuaries, lagoons, lakes, and rivers during breeding; sandy beaches, mudflats, and salt-pond dikes when resting; shallow depression on level ground on sandy or gravelly beaches and banks of rivers or lakes with sparse or no vegetation during nesting	No suitable habitat present; No Effect

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
Yellow-billed cuckoo	<i>Coccyzus americanus</i>	Threatened	Open woodland (especially where undergrowth is thick), parks, deciduous riparian woodland; in the west, tall cottonwood and willow riparian woodland	No suitable habitat present; No Effect
Pima pineapple cactus	<i>Coryphantha scheeri</i> var. <i>robustispina</i>	Endangered	Alluvial valleys, mesas, and hillsides in desert, desert grassland, or southwestern oak woodlands	No suitable habitat present; No Effect

The proposed tower compound is located within an area of bare soil and piles of soil and concrete adjacent to I-19 and on a larger parcel occupied by Capilla del Senor de los Milagros church. The proposed fiber run is located within same cleared lot and extends into a narrow grassed/treed strip to north which lies between the western end of W 44th Street and I-19. No suitable habitat was identified for any federally listed or proposed threatened or endangered species identified by USFWS as potentially occurring within the project area. A Tower Site Evaluation Form is attached.

Conclusions

Based on the information reviewed and the site inspection, ECA has found no evidence that the project area would provide suitable habitat for any federally listed or proposed species identified by USFWS as potentially occurring within the project area or that any designated or proposed critical habitat is present within the project vicinity. Based on these findings, the proposed undertaking would have no effect on any federally threatened or endangered species or designated critical habitat. Further, the proposed project would not jeopardize the continued existence of any federally proposed threatened or endangered species and would not result in the destruction or adverse modification of proposed critical habitat.

Closure

Shannon Lowman of ECA conducted the site visit and area inspection, and Ashley Bean collected the applicable information, and compiled this report. Ben Salter, a Principal Scientist at ECA, reviewed this report. Mr. Salter's resume is included in Attachment E.

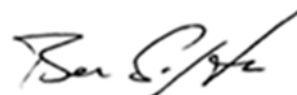
We appreciate the opportunity to provide you with these professional services. For any questions or additional information, please contact Ashley Bean by phone at 828-505-0755, by email at ashley.bean@eca-usa.com, or by mail at 1340 Patton Avenue, Suite K, Asheville, North Carolina, 28806.

Sincerely yours,

Environmental Corporation of America



Ashley Bean
Project Manager



Ben Salter
Principal Scientist

ATTACHMENT C

Protected Species Information



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Arizona Ecological Services Field Office
9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517
Phone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer To:
Project Code: 2023-0087553
Project Name: 23-001190

May 31, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that *may* occur within the One-Range that has been delineated for the species (candidate, proposed, or listed) and its critical habitat (designated or proposed) with which your project polygon intersects. These range delineations are based on biological metrics, and do not necessarily represent exactly where the species is located. Please refer to the species information found on ECOS to determine if suitable habitat for the species on your list occurs in your project area.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If the Federal action agency determines that listed species or critical habitat *may be affected* by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

or habitat segment may be affected. The effects analysis should include the entire action area, which often extends well outside the project boundary or "footprint." For example, projects that involve streams and river systems should consider downstream affects. If the Federal action agency determines that the action may jeopardize a *proposed* species or may adversely modify *proposed* critical habitat, the agency must enter into a section 7 conference. The agency may choose to confer with us on an action that may affect proposed species or critical habitat.

Candidate species are those for which there is sufficient information to support a proposal for listing. Although candidate species have no legal protection under the Act, we recommend that they be considered in the planning process in the event they become proposed or listed prior to project completion. More information on the regulations (50 CFR 402) and procedures for section 7 consultation, including the role of permit or license applicants, can be found in our Endangered Species Consultation Handbook at: <https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>.

We also advise you to consider species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668 *et seq.*). The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when authorized by the Service. The Eagle Act prohibits anyone, without a permit, from taking (including disturbing) eagles, and their parts, nests, or eggs. Currently 1,026 species of birds are protected by the MBTA, including the western burrowing owl (*Athene cunicularia hypugaea*). Protected western burrowing owls can be found in urban areas and may use their nest/burrows year-round; destruction of the burrow may result in the unpermitted take of the owl or their eggs.

If a bald eagle or golden eagle nest occurs in or near the proposed project area, our office should be contacted for Technical Assistance. An evaluation must be performed to determine whether the project is likely to disturb or harm eagles. The National Bald Eagle Management Guidelines provide recommendations to minimize potential project impacts to bald eagles (see <https://www.fws.gov/law/bald-and-golden-eagle-protection-act> and <https://www.fws.gov/program/eagle-management>).

The Division of Migratory Birds (505/248-7882) administers and issues permits under the MBTA and Eagle Act, while our office can provide guidance and Technical Assistance. For more information regarding the MBTA, BGEPA, and permitting processes, please visit the following web site: <https://www.fws.gov/program/migratory-bird-permit>. Guidance for minimizing impacts to migratory birds for communication tower projects (e.g. cellular, digital television, radio, and emergency broadcast) can be found at <https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation>.

The U.S. Army Corps of Engineers (Corps) may regulate activities that involve streams (including some intermittent streams) and/or wetlands. We recommend that you contact the Corps to determine their interest in proposed projects in these areas. For activities within a National Wildlife Refuge, we recommend that you contact refuge staff for specific information about refuge resources, please visit [this link](#) or visit <https://www.fws.gov/program/national->

[wildlife-refuge-system](#) to locate the refuge you would be working in or around.

If your action is on tribal land or has implications for off-reservation tribal interests, we encourage you to contact the tribe(s) and the Bureau of Indian Affairs (BIA) to discuss potential tribal concerns, and to invite any affected tribe and the BIA to participate in the section 7 consultation. In keeping with our tribal trust responsibility, we will notify tribes that may be affected by proposed actions when section 7 consultation is initiated. For more information, please contact our Tribal Coordinator, John Nystedt, at 928/556-2160 or John.Nystedt@fws.gov.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. Information on known species detections, special status species, and Arizona species of greatest conservation need, such as the western burrowing owl and the Sonoran desert tortoise (*Gopherus morafkai*) can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program (<https://www.azgfd.com/wildlife/planning/projevalprogram/>).

We appreciate your concern for threatened and endangered species. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office. If we may be of further assistance, please contact our Flagstaff office at 928/556-2118 for projects in northern Arizona, our general Phoenix number 602/242-0210 for central Arizona, or 520/670-6144 for projects in southern Arizona.

Sincerely,
/s/

Heather Whitlaw
Field Supervisor
Attachment

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
 - Wetlands
-

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arizona Ecological Services Field Office

9828 North 31st Ave

#c3

Phoenix, AZ 85051-2517

(602) 242-0210

PROJECT SUMMARY

Project Code: 2023-0087553
Project Name: 23-001190
Project Type: Communication Tower New Construction
Project Description: Telecom Pole
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.184972349999995,-110.98371294096438,14z>



Counties: Pima County, Arizona

ENDANGERED SPECIES ACT SPECIES

There is a total of 10 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Jaguar <i>Panthera onca</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3944	Endangered
Ocelot <i>Leopardus (=Felis) pardalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4474	Endangered

BIRDS

NAME	STATUS
California Least Tern <i>Sterna antillarum browni</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8104	Endangered
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

REPTILES

NAME	STATUS
Sonoyta Mud Turtle <i>Kinosternon sonoriense longifemorale</i> There is final critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/7276	Endangered

FISHES

NAME	STATUS
Gila Chub <i>Gila intermedia</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/51	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

FLOWERING PLANTS

NAME	STATUS
Arizona Eryngo <i>Eryngium sparganophyllum</i> Population: There is final critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/10705	Endangered
Huachuca Water-umbel <i>Lilaeopsis schaffneriana var. recurva</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1201	Endangered
Pima Pineapple Cactus <i>Coryphantha scheeri var. robustispina</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4919	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\) list](#) or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Oct 15 to Aug 31
Black-chinned Sparrow <i>Spizella atrogularis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9447	Breeds Apr 15 to Jul 31

NAME	BREEDING SEASON
Costa's Hummingbird <i>Calypte costae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9470	Breeds Jan 15 to Jun 10
Gila Woodpecker <i>Melanerpes uropygialis</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5960	Breeds Apr 1 to Aug 31
Gilded Flicker <i>Colaptes chrysoides</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2960	Breeds May 1 to Aug 10
Grace's Warbler <i>Dendroica graciae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds May 20 to Jul 20
Lawrence's Goldfinch <i>Carduelis lawrencei</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9464	Breeds Mar 20 to Sep 20
Rufous-winged Sparrow <i>Aimophila carpalis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jun 15 to Sep 30
Western Grebe <i>aechmophorus occidentalis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743	Breeds Jun 1 to Aug 31
Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#)

may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
-

2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities,

should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America

Name: Ryan Edson

Address: 1375 Union Hill Industrial Ct.

City: Alpharetta

State: GA

Zip: 30004

Email: ryan.edson@eca-usa.com

Phone: 7706672040

Critical Habitat for Threatened & Endangered Species [USFWS]



A specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

600ft

Maxar

ATTACHMENT D

Tower Site Evaluation Form

TOWER SITE EVALUATION FORM

1. Location (Provide maps if possible):

State: AZ County: Pima

Latitude/Longitude/GPS Grid: N 32° 11' 5.6" W 110° 59' 1.6"

Directions: From Tucson AZ, Head west on W Jacinto St toward N Balboa Avenue. Take W grant Road, I-10 E and S Freeway to W 44th Street. Follow W 44th Street to S 12th Avenue. Turn left onto S 12th Avenue. Drive to W 44th Street and the destination will be on the left.

2. Elevation above mean sea level: ~2,435 feet

3. Will the equipment be co-located on an existing **FCC licensed tower** or other existing structure (building, billboard, etc.)? (y/n) No If yes, type of structure: _____

If yes, no further information is required.

4. If no, provide proposed specifications for new tower:

Height: 75' Construction type (lattice, monopole, etc.): Monopole

Guy-wired? (y/n) No No. Bands: NA Total No. Wires: NA

Lighting (Security & Aviation): NA

If tower will be lighted or guy-wired, complete items 5-19. If not, complete only items 19 and 20.

5. Area of tower footprint in acres or square feet: _____

6. Length and width of access road in feet: _____

7. General description of terrain – mountainous, rolling hills flat to undulation, etc. Photographs of the site and surrounding area are beneficial:

8. Meteorological conditions (incidence of fog, low ceilings, etc.): _____

9. Soil type(s): _____

10. Habitat types and land use on and adjacent to the site, by acreage and percentage of total:

11. Dominant vegetative species in each habitat: _____

12. Average diameter breast height of dominant tree species in forested areas: _____

13. Will construction at this site cause fragmentation of a larger block of habitat into two or more smaller blocks? (y/n) _____ If yes, describe: _____

14. Is evidence of birds roosts or rookeries present? (y/n) _____ If yes, describe: _____

15. Distance to nearest wetland area (forested swamp, march, riparian, marine, etc.), and coastline if applicable: _____
16. Distance to nearest telecommunications tower: _____
17. Potential for co-location of antennas on existing towers or other structures: _____
18. Have measures been incorporated to minimizing impacts to migratory birds? (y/n) _____
19. Has an evaluation been made to determine if proposed facility may affect listed or proposed endangered or threatened species or their habitat as required by FCC regulation at 47 CFR 1.1307(a)(3)? (y/n) Yes If, yes present findings: _____ No effect for all listed or proposed species
20. Additional information required:

Ryan Edson

From: cboucher@azgfd.gov on behalf of Project Evaluation Program - Game and Fish <pep@azgfd.gov>
Sent: Tuesday, August 15, 2023 7:49 PM
To: Ryan Edson
Subject: Re: Project Evaluation Requests

Hi Ryan,

As the proposed project is located in a previously disturbed area, with the present habitat providing relatively low value to wildlife, the Department does not anticipate any significant adverse impacts to wildlife resources would occur as a result of this project.

This email serves as our official response.

Thank you for the opportunity to review this project.

If you have any questions regarding this letter, please feel free to contact me.

CHERI BOUCHÉR | PROJECT EVALUATION PROGRAM SPECIALIST
ARIZONA GAME AND FISH DEPARTMENT

OFFICE: 623-236-7615

EMAIL: cboucher@azgfd.gov

azgfd.gov | 5000 W. Carefree Highway, Phoenix, AZ 85086

Join our new [Conservation Membership](#) program and ensure a wildlife legacy for the future.

On Wed, Jun 28, 2023 at 11:28 AM Ryan Edson <ryan.edson@eca-usa.com> wrote:

Hello,

Please see the attached project evaluation request for sites within Pima, Pinal, and Maricopa counties.

Thanks!

Ryan Edson (he/him)

Client Manager/Senior NEPA Specialist

Environmental Corporation of America (ECA)

678-477-4509 (Mobile/Remote)

ryan.edson@eca-usa.com

www.eca-usa.com



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

June 28, 2023

Arizona Department of Game and Fish
Project Evaluation Program
5000 W. Carefree Highway
Phoenix, AZ 85086-5000

Attention: Ms. Ginger Ritter
Project Evaluation Supervisor

Subject: Proposed 70-Foot Monopole Telecommunications Structure
Native Networks Site Milagros
Off W 44th Street
Tucson, Pima County, Arizona
Latitude: N 32° 11' 06.3" Longitude: W 110° 59' 0.5"
ECA Project Number: 23-001190

Dear Ms. Ritter:

Environmental Corporation of America (ECA) is assisting Native Networks with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

The purpose of this letter is to request Arizona Game and Fish Department (AGF) comments relative to the potential effects of the proposed project on sensitive natural resources. ECA has utilized the Arizona On-line Environmental Review Tool and has completed a Project Evaluation Request Form. The generated report, completed form, and figures and photographs for the proposed project are attached to this letter.

For any questions or to request additional information, please contact Ryan Edson by phone at 770-667-2040, by email at ryan.edson@eca-usa.com, or by mail at 1375 Union Hill Industrial Court, Alpharetta, GA 30040.

Sincerely yours,
Environmental Corporation of America

A handwritten signature in black ink that reads 'Ryan Edson'.

Ryan Edson
Project Manager

Project Evaluation Request
Arizona Game and Fish Department

Notice: In order to obtain a review of your project, we require all of the information requested on this form to be provided. This review is free of charge. However, due to staff and budgetary constraints, we ask you to submit this form early in the process, as estimated turn around time is 30 days (if you need this review in less than 30 days, please include a needed by date and we will try to accommodate your request). This request is a preliminary review and further project review should include draft documents and a letter formally requesting further environmental review.

Project Evaluation Objectives:

Habitat Evaluation incorporates fish and wildlife resource needs or features in land and water development projects and land and water management planning efforts in Arizona.

Habitat Protection ensures habitat protection through environmental compliance and regulation, and to monitor the implementation and effectiveness of mitigation commitments for various land and water development projects and management planning activities in Arizona.

Instructions:

The following is required to process the request

- Completed form
- Map(s) delineating the project area (preferably a USGS quadrangle map)
- Relevant attachments (other supportive documents, photographs, etc.)

Send to:

Arizona Game and Fish Department
 Project Evaluation Program, WMHB
 5000 W Carefree Highway
 Phoenix, Arizona 85086
 Fax: 623-236-7366
 Email: PEP@azgfd.gov

Proposed Project Information

Project Name and/or Identification Number:

Date of Request:

What is the proposed date you intend to begin work on the project?

Applicant Requesting Project Evaluation

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Individual/Organization/Agency Proposing Project (if different from above)

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Location of Proposed Project *Remember to attach a topographic and/or plat map delineating the project area*

County(ies):

Township(s):

Range(s):

Section(s):

Proposed Project Information (continued)

Please briefly describe the project and project activities.

Briefly describe current land uses and habitat types in the project area.

List any waterbodies such as rivers, intermittent streams, lakes, or wetlands within or near the project area. Xeric washes should also be described, along with any anticipated impacts as a result of the project.

List any reports that have been prepared to describe the habitat that will be affected by the proposed project (e.g. habitat reconnaissance surveys, wetland delineation, etc.)

List any other resources or reviews that relate to the proposed project (correspondence, other phases of the project, other alternatives, etc.)

List any permits, licenses, or regulatory approvals you have or plan on applying for, or have already received as part of this project.

Return as hard copy to AZ Game & Fish Dept., Project Evaluation Program-Habitat Branch, 5000 W Carefree Highway, Phoenix, AZ 85086 or via email to pep@azgfd.gov or fax 623-236-7366

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:

Native Networks Milagros

User Project Number:

23-001190

Project Description:

Proposed 70-foot monopole telecommunications tower

Project Type:

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

Contact Person:

Ben Salter

Organization:

Environmental Corporation of America

On Behalf Of:

OTHER_FED

Project ID:

HGIS-19414

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. Arizona Wildlife Conservation Strategy (AWCS), specifically Species of Greatest Conservation Need (SGCN), 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:

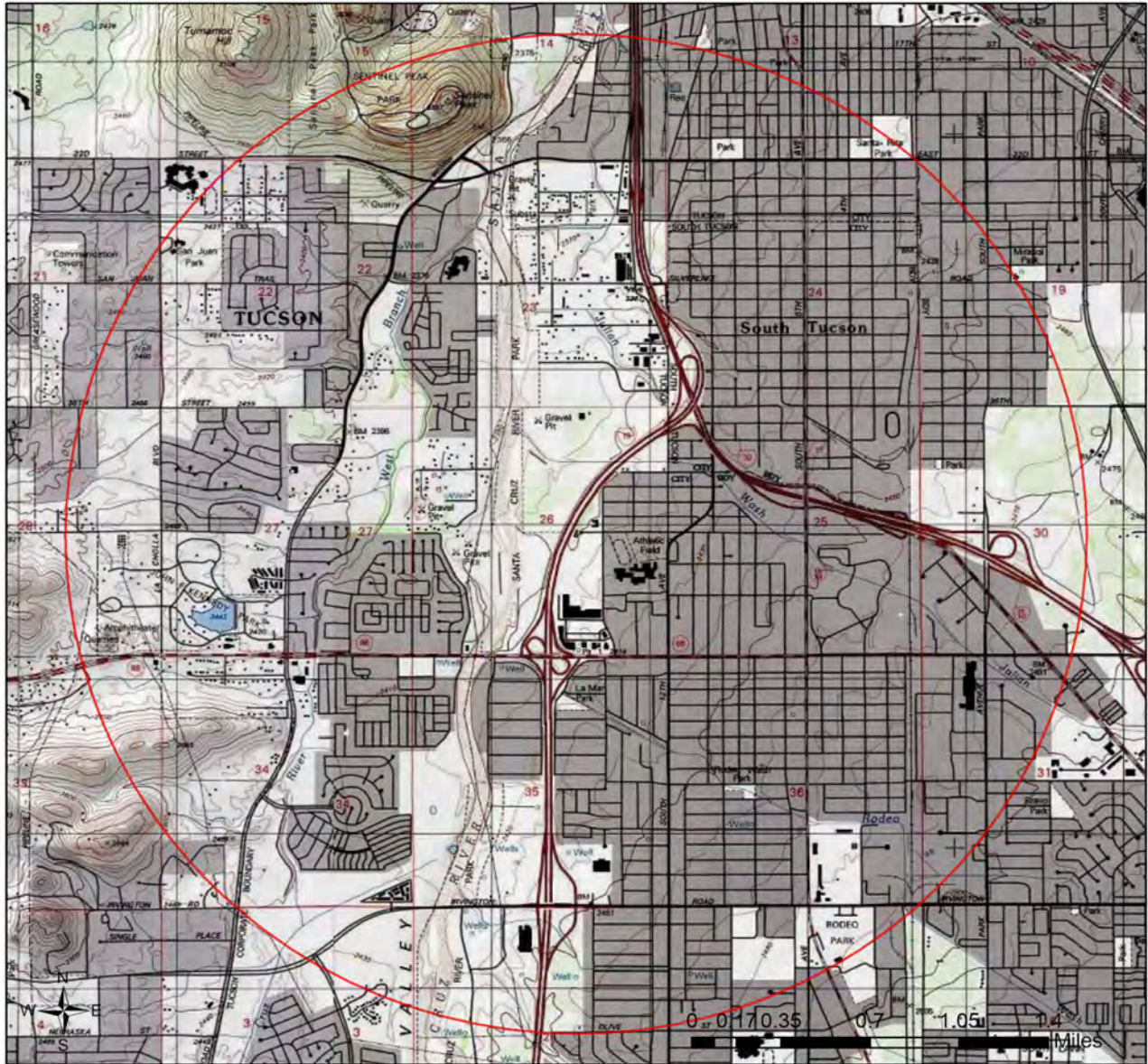
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

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

Native Networks Milagros

USA Topo Basemap With Locator Map



- Buffered Project Boundary
- Project Boundary

Project Size (acres): 0.08

Lat/Long (DD): 32.1849 / -110.9838

County(s): Pima

AGFD Region(s): Tucson

Township/Range(s): T14S, R13E

USGS Quad(s): TUCSON



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



Native Networks Milagros

Web Map As Submitted By User

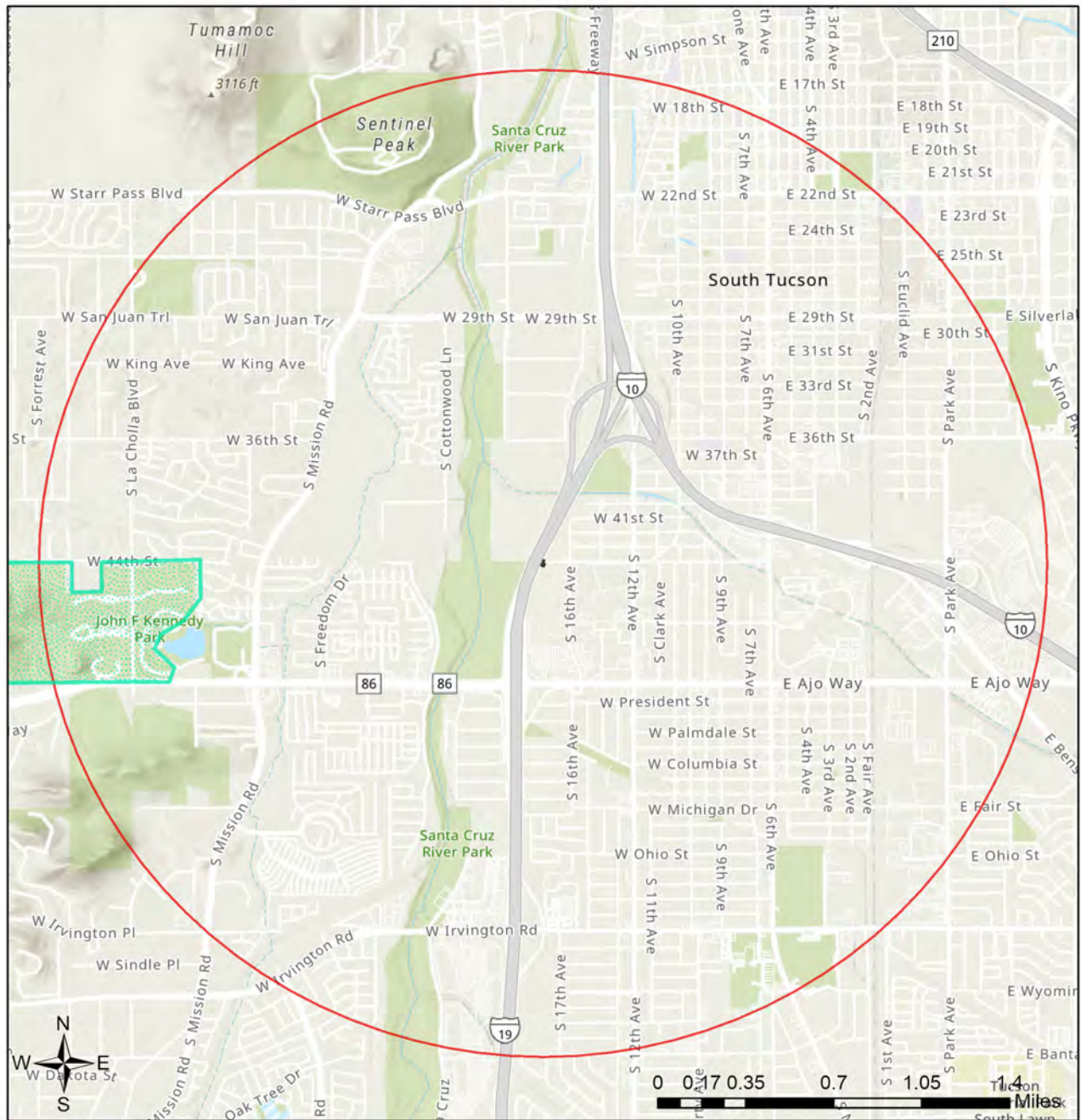


-  Buffered Project Boundary
-  Project Boundary

Project Size (acres): 0.08
Lat/Long (DD): 32.1849 / -110.9838
County(s): Pima
AGFD Region(s): Tucson
Township/Range(s): T14S, R13E
USGS Quad(s): TUCSON

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Native Networks Milagros Important Areas

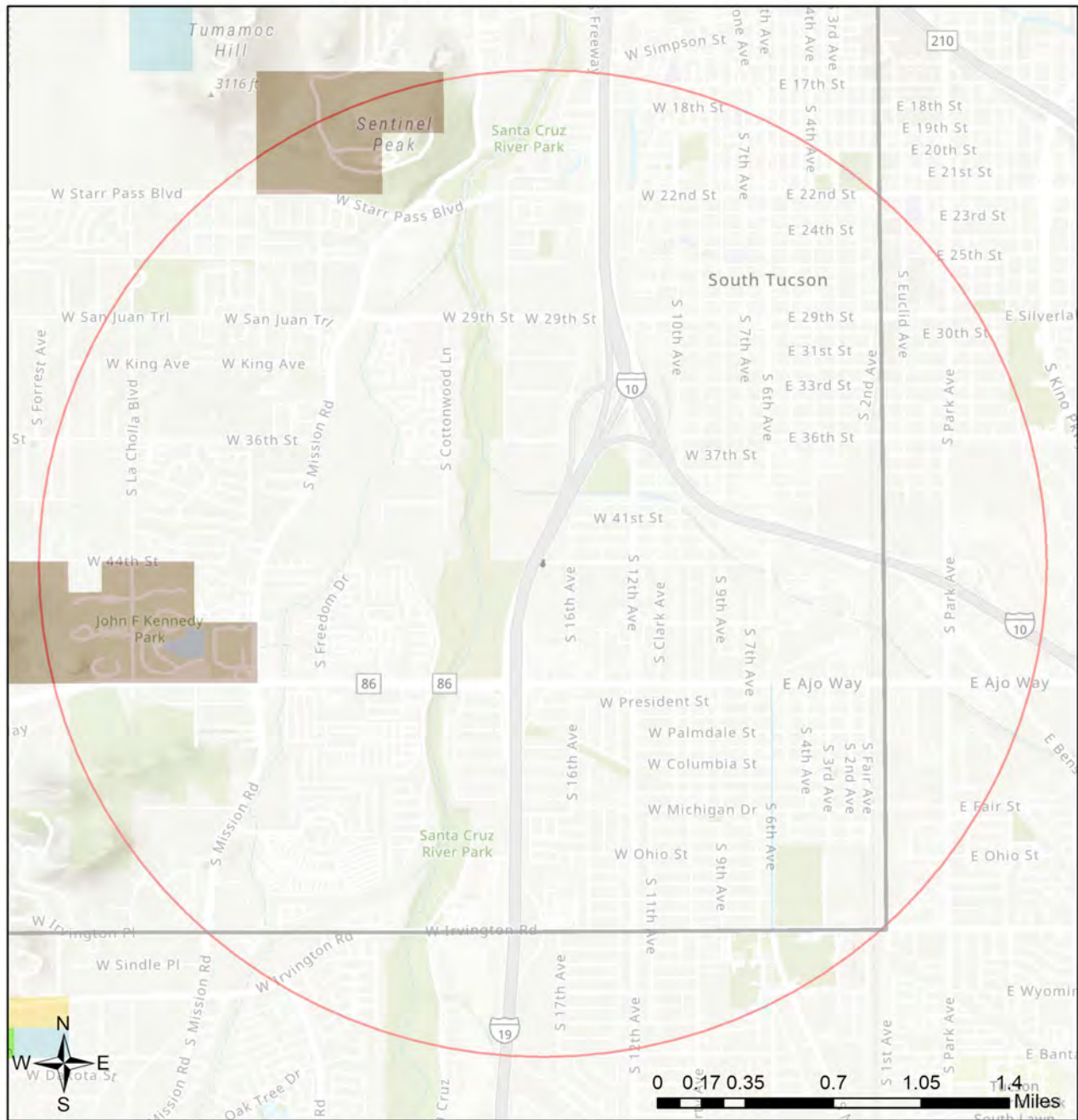


- Buffered Project Boundary
- Project Boundary
- Important Bird Areas
- Critical Habitat
- Pinal County Riparian
- Important Connectivity Zones
- Wildlife Connectivity

Project Size (acres): 0.08
 Lat/Long (DD): 32.1849 / -110.9838
 County(s): Pima
 AGFD Region(s): Tucson
 Township/Range(s): T14S, R13E
 USGS Quad(s): TUCSON

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatasryelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Native Networks Milagros Township/Ranges and Land Ownership



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

Project Size (acres): 0.08
 Lat/Long (DD): 32.1849 / -110.9838
 County(s): Pima
 AGFD Region(s): Tucson
 Township/Range(s): T14S, R13E
 USGS Quad(s): TUCSON

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Special Status Species Documented within 2 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Agelaius phoeniceus	Red-winged Blackbird					2
Aspidoscelis sonorae	Sonoran Spotted Whiptail					2
Aspidoscelis stictogramma	Giant Spotted Whiptail	SC	S			2
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		2
Bat Colony						
Campylorhynchus brunneicapillus	Cactus Wren					2
Chilomeniscus stramineus	Variable Sandsnake					2
Danaus plexippus	Monarch	C		S		
Eryngium sparganophyllum	Arizona Eryngo	LE		S		
Euphagus cyanocephalus	Brewer's Blackbird					2
Falco sparverius	American Kestrel					2
Gastrophryne mazatlanensis	Sinoloan Narrow-mouthed Toad			S		2
Heloderma suspectum	Gila Monster					1
Incilius alvarius	Sonoran Desert Toad					2
Lilaeopsis schaffneriana ssp. recurva	Huachuca Water-umbel	LE		S	HS	
Melospiza aberti	Abert's Towhee		S			2
Myotis velifer	Cave Myotis	SC		S		2
Peucaea carpalis	Rufous-winged Sparrow					2
Phrynosoma solare	Regal Horned Lizard					2
Poeciliopsis occidentalis occidentalis	Gila Topminnow	LE		S		1
Progne subis hesperia	Desert Purple Martin			S		2
Rana yavapaiensis	Lowland Leopard Frog	SC	S	S		1
Tadarida brasiliensis	Brazilian Free-tailed Bat					2
Tumamoca macdougallii	Tumamoc Globeberry	SC	S	S	SR	

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

Special Areas Documented that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Santa Cruz River	Pima County Wildlife Movement Area - Riparian/Wash					

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

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Anthocharis cethura	Desert Orangetip					

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Antrozous pallidus</i>	Pallid Bat					
<i>Aspidoscelis stictogramma</i>	Giant Spotted Whiptail		S			2
<i>Athene cucularia hypugaea</i>	Western Burrowing Owl		S	S		2
Bat Colony						
Bat Foraging Area	High Netting Concentration					
<i>Boerhavia megaptera</i>	Tucson Mountain Spiderling					
<i>Capsicum annuum</i> var. <i>glabrusculum</i>	Chiltepin		S			
<i>Chaetodipus intermedius</i>	Rock Pocket Mouse					
<i>Cheilanthes pringlei</i>	Pringle's Lip Fern					
<i>Chloroceryle americana</i>	Green Kingfisher					
<i>Coccyzus americanus</i>	Yellow-billed Cuckoo (Western DPS)		S	S		1
<i>Coleonyx variegatus</i>	Western Banded Gecko					
<i>Coryphantha scheeri</i> var. <i>robustispina</i>	Pima Pineapple Cactus				HS	
<i>Cuscuta odontolepis</i>	Santa Rita Dodder					
<i>Cynanthus latirostris</i>	Broad-billed Hummingbird		S			2
<i>Eptesicus fuscus</i>	Big Brown Bat					
<i>Eumops perotis californicus</i>	Greater Western Bonneted Bat			S		2
<i>Euphorbia gracillima</i>	Mexican Broomspurge					
<i>Gastrophryne mazatlanensis</i>	Sinoloan Narrow-mouthed Toad			S		2
<i>Gopherus morafkai</i>	Sonoran Desert Tortoise		S	S		1
<i>Heloderma suspectum</i>	Gila Monster					1
<i>Ibervillea tenuisecta</i>	Texas Globe Berry					
<i>Lasiurus xanthinus</i>	Western Yellow Bat		S			2
<i>Lilaeopsis schaffneriana</i> ssp. <i>recurva</i>	Huachuca Water-umbel				HS	
<i>Lithobates yavapaiensis</i>	Lowland Leopard Frog		S	S		1
<i>Myotis velifer</i>	Cave Myotis			S		2
<i>Nyctinomops femorosaccus</i>	Pocketed Free-tailed Bat					2
<i>Opuntia versicolor</i>	Stag-horn Cholla				SR	
<i>Parabuteo unicinctus</i>	Harris's Hawk					2
<i>Parastrellus hesperus</i>	Canyon Bat					
<i>Sonorella magdalenensis</i>	Sonoran Talussnail		S	S		3
<i>Streptanthus carinatus</i>	Lyre-leaved Twistflower					
<i>Tadarida brasiliensis</i>	Brazilian Free-tailed Bat					2
<i>Trimorphodon lambda</i>	Sonoran Lyresnake					
<i>Tumamoca macdougallii</i>	Tumamoc Globeberry		S	S	SR	

Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
Odocoileus hemionus	Mule Deer					
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, canted, 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 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. See the Arizona Department of Agriculture website for a list of prohibited and restricted noxious weeds at <https://www.invasivespeciesinfo.gov/unitedstates/az.shtml> and the Arizona Native Plant Society <https://aznps.com/invas> for recommendations on how to control. To view a list of documented invasive species or to report invasive species in or near your project area visit iMapInvasives - a national cloud-based application for tracking and managing invasive species at <https://imap.natureserve.org/imap/services/page/map.html>.

- To build a list: zoom to your area of interest, use the identify/measure tool to draw a polygon around your area of interest, and select "See What's Here" for a list of reported species. To export the list, you must have an account and be logged in. You can then use the export tool to draw a boundary and export the records in a csv file.

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 (<https://azstateparks.com/>).

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

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/sites/default/files/Native%20Plant%20Rules%20-%20AZ%20Dept%20of%20Ag.pdf> starts on page 44

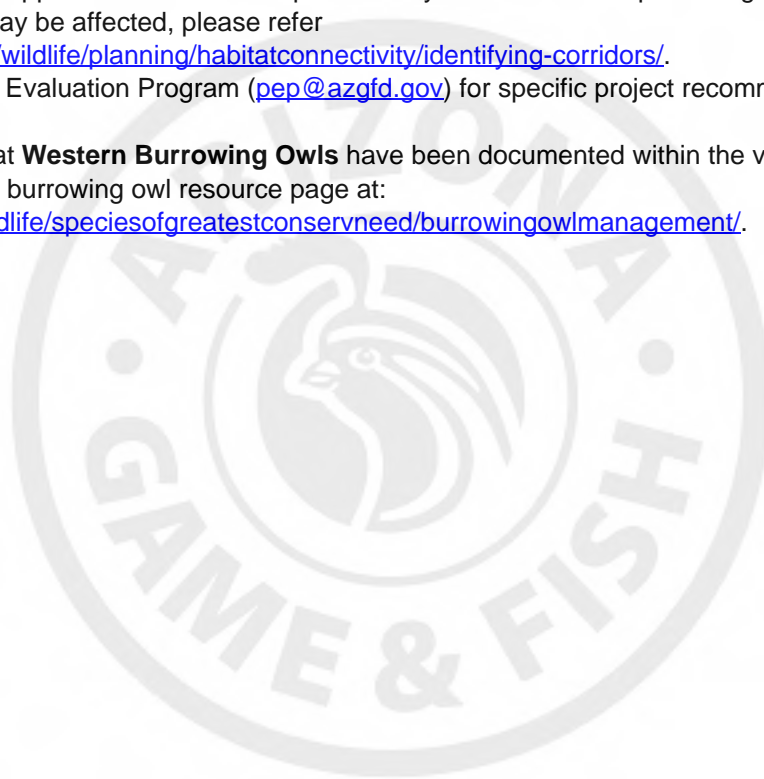
Analysis indicates that your project is located in the vicinity of an identified **wildlife habitat connectivity feature**. The **County-level Stakeholder Assessments** contain five categories of data (Barrier/Development, Wildlife Crossing Area, Wildlife Movement Area- Diffuse, Wildlife movement Area- Landscape, Wildlife Movement Area- Riparian/Washes) that provide a context of select anthropogenic barriers, and potential connectivity. The reports provide recommendations for opportunities to preserve or enhance permeability. Project planning and implementation efforts should focus on maintaining and improving opportunities for wildlife permeability. For information pertaining to the linkage assessment and wildlife species that may be affected, please refer

to: <https://www.azgfd.com/wildlife/planning/habitatconnectivity/identifying-corridors/>.

Please contact the Project Evaluation Program (pep@azgfd.gov) for specific project recommendations.

HDMS records indicate that **Western Burrowing Owls** have been documented within the vicinity of your project area. Please review the western burrowing owl resource page at:

<https://www.azgfd.com/wildlife/speciesofgreatestconservneed/burrowingowlmanagement/>.



Old Pascua Tower Site



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

August 3, 2023

U.S. Department of Commerce
National Telecommunications & Information Administration
1401 Constitution Avenue NW
Washington, DC 20230

Attention: Mr. Josh Fitzpatrick

**Subject: Informal Biological Assessment
Proposed Collocation/Modification of Antennas on an Existing 80-Foot Tall
Monopole Telecommunications Structure with Ground Disturbance
Native Network Site Old Pascua
856 W Calle Santa Ana
Tucson, Pima County, Arizona
Tucson, AZ USGS Quadrangle Map
Latitude: N 32° 14' 53.3" W 110° 59' 9.7"
ECA Project Number: 23-001203**

Mr. Fitzpatrick:

Environmental Corporation of America (ECA) is assisting Native Network, Inc. with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

Based on the specifications of the proposed project, the information reviewed, and observations made during our site visit, ECA was able to make a "no effect" determination for the proposed undertaking. Therefore, consultation with the United States Fish and Wildlife Service (USFWS) would not be required. This Informal Biological Assessment (IBA) documents our findings with respect to federally listed or proposed threatened and endangered species at the project site.

Background

The project area location is shown on Figure 1. Figure 2 is a plan view that shows the site configuration. Figure 3 is a recent aerial photograph of the site area. Native Network proposes to install antennas on an existing 80-foot tall monopole telecommunications structure to install equipment within an existing fenced compound adjacent to the tower structure, and to install an underground fiber runs.

The project area would consist of an approximately 5-foot by 10-foot generator/propane pad, a proposed 28-inch by 22-inch equipment cabinet, and a proposed approximately 110-foot long

fiber run. The project area would also consist of a proposed approximately 50-foot long power route (option 1) or a proposed approximate 65-foot long power route (option 2). The proposed equipment area is located within an area of bare soil adjacent to W Calle Santa Ana and on a block of the street occupied by residential houses. The proposed fiber run is located within the same cleared lot and would extend south towards W Calle Santa Ana. The proposed power route is located within the same cleared lot and would run in a southerly then easterly direction across the graveled lot to end at an existing power box adjacent to the Old Pascua Museum and Yaqui Culture Center building (option one) or end at an existing power box adjacent to the Culture Center Restroom building (option two). Descriptions of the photographs are provided underneath each photograph and photograph locations are graphically depicted on Figure 2.

Based on National Wetlands Inventory data, no wetlands or waters are mapped within the project area. During the site visit, no evidence of surface waters or the three criteria required for an area to be characterized as wetland was observed. Therefore, it does not appear that the project would result in impacts to wetlands or waters.

Purpose

The purpose of this letter is to provide you with documentation of our investigations and findings relative to federally listed or proposed threatened and endangered species within the project area.

Review of Available Documentation and Site Inspection

ECA has reviewed the USFWS Information for Planning and Consultation (IPaC) system species list for the project area and the USFWS Critical Habitat Mapper (see Attachment C). ECA has also reviewed information from various sources pertaining to the habitat requirements of the listed species. Habitat at the site was evaluated during a May 16, 2023 site visit, which was conducted by Shannon Lowman of ECA.

Discussion of Findings

Because the proposed undertaking would not result in impacts to surface waters or wetlands, aquatic species are not a concern for this undertaking. The nearest surface water is the Santa Cruz River located approximately 1,700 feet southwest of the existing tower facility at its closest point. Non-aquatic species recognized by the USFWS as potentially occurring within the project area are listed in the table below along with a habitat description and a finding of effect for each. No designated critical habitat was identified within the project area.

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
Ocelot	<i>Leopardus</i> (= <i>Felis</i>) <i>pardalis</i>	Endangered	Habitats with good cover; when active by day, tends to keep hidden in dense brush; Inhabits dense chaparral thickets in Texas; Elsewhere, occurs in humid tropical forests, mangrove forests, swampy savannas, brushland, and riverine scrub in deserts	No suitable habitat present; No Effect

Common Name	Scientific Name	Federal Status	Habitat	Finding of Effect
California least tern	<i>Sterna antillarum browni</i>	Endangered	Seacoasts, beaches, bays, estuaries, lagoons, lakes, and rivers during breeding; sandy beaches, mudflats, and salt-pond dikes when resting; shallow depression on level ground on sandy or gravelly beaches and banks of rivers or lakes with sparse or no vegetation during nesting	No suitable habitat present; No Effect
Yellow-billed cuckoo	<i>Coccyzus americanus</i>	Threatened	Open woodland (especially where undergrowth is thick), parks, deciduous riparian woodland; in the west, tall cottonwood and willow riparian woodland	No suitable habitat present; No Effect

The proposed equipment area is located within an area of bare soil adjacent to W Calle Santa Ana and on a block of the street occupied by residential houses. The proposed fiber run is located within the same cleared lot and would extend south towards W Calle Santa Ana. The proposed power route is located within the same cleared lot and would run in a southerly then easterly direction across the graveled lot to end at an existing power box adjacent to the Old Pascua Museum and Yaqui Culture Center building (option one) or end at an existing power box adjacent to the Culture Center Restroom building (option two). No suitable habitat was identified for any federally listed or proposed threatened or endangered species identified by USFWS as potentially occurring within the project area.

Conclusions

Based on the information reviewed and the site inspection, ECA has found no evidence that the project area would provide suitable habitat for any federally listed or proposed species identified by USFWS as potentially occurring within the project area or that any designated or proposed critical habitat is present within the project vicinity. Based on these findings, the proposed undertaking would have no effect on any federally threatened or endangered species or designated critical habitat. Further, the proposed project would not jeopardize the continued existence of any federally proposed threatened or endangered species and would not result in the destruction or adverse modification of proposed critical habitat.

Closure

Shannon Lowman of ECA conducted the site visit and area inspection, and Ashley Bean collected the applicable information, and compiled this report. Ben Salter, a Principal Scientist at ECA, reviewed this report. Mr. Salter's resume is included in Attachment E.

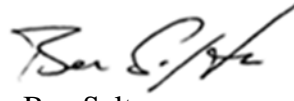
Mr. Josh Fitzpatrick
Page 4

We appreciate the opportunity to provide you with these professional services. For any questions or additional information, please contact Ashley Bean by phone at 828-505-0755, by email at ashley.bean@eca-usa.com, or by mail at 1340 Patton Avenue, Suite K, Asheville, North Carolina, 28806.

Sincerely yours,
Environmental Corporation of America



Ashley Bean
Project Manager



Ben Salter
Principal Scientist

ATTACHMENT C

Protected Species Information



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Arizona Ecological Services Field Office
9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517
Phone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer To:
Project Code: 2023-0075135
Project Name: Old Pascua

April 27, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that *may* occur within the One-Range that has been delineated for the species (candidate, proposed, or listed) and its critical habitat (designated or proposed) with which your project polygon intersects. These range delineations are based on biological metrics, and do not necessarily represent exactly where the species is located. Please refer to the species information found on ECOS to determine if suitable habitat for the species on your list occurs in your project area.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If the Federal action agency determines that listed species or critical habitat *may be affected* by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

or habitat segment may be affected. The effects analysis should include the entire action area, which often extends well outside the project boundary or "footprint." For example, projects that involve streams and river systems should consider downstream affects. If the Federal action agency determines that the action may jeopardize a *proposed* species or may adversely modify *proposed* critical habitat, the agency must enter into a section 7 conference. The agency may choose to confer with us on an action that may affect proposed species or critical habitat.

Candidate species are those for which there is sufficient information to support a proposal for listing. Although candidate species have no legal protection under the Act, we recommend that they be considered in the planning process in the event they become proposed or listed prior to project completion. More information on the regulations (50 CFR 402) and procedures for section 7 consultation, including the role of permit or license applicants, can be found in our Endangered Species Consultation Handbook at: <https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>.

We also advise you to consider species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668 *et seq.*). The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when authorized by the Service. The Eagle Act prohibits anyone, without a permit, from taking (including disturbing) eagles, and their parts, nests, or eggs. Currently 1,026 species of birds are protected by the MBTA, including the western burrowing owl (*Athene cunicularia hypugaea*). Protected western burrowing owls can be found in urban areas and may use their nest/burrows year-round; destruction of the burrow may result in the unpermitted take of the owl or their eggs.

If a bald eagle or golden eagle nest occurs in or near the proposed project area, our office should be contacted for Technical Assistance. An evaluation must be performed to determine whether the project is likely to disturb or harm eagles. The National Bald Eagle Management Guidelines provide recommendations to minimize potential project impacts to bald eagles (see <https://www.fws.gov/law/bald-and-golden-eagle-protection-act> and <https://www.fws.gov/program/eagle-management>).

The Division of Migratory Birds (505/248-7882) administers and issues permits under the MBTA and Eagle Act, while our office can provide guidance and Technical Assistance. For more information regarding the MBTA, BGEPA, and permitting processes, please visit the following web site: <https://www.fws.gov/program/migratory-bird-permit>. Guidance for minimizing impacts to migratory birds for communication tower projects (e.g. cellular, digital television, radio, and emergency broadcast) can be found at <https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation>.

The U.S. Army Corps of Engineers (Corps) may regulate activities that involve streams (including some intermittent streams) and/or wetlands. We recommend that you contact the Corps to determine their interest in proposed projects in these areas. For activities within a National Wildlife Refuge, we recommend that you contact refuge staff for specific information about refuge resources, please visit [this link](#) or visit <https://www.fws.gov/program/national->

[wildlife-refuge-system](#) to locate the refuge you would be working in or around.

If your action is on tribal land or has implications for off-reservation tribal interests, we encourage you to contact the tribe(s) and the Bureau of Indian Affairs (BIA) to discuss potential tribal concerns, and to invite any affected tribe and the BIA to participate in the section 7 consultation. In keeping with our tribal trust responsibility, we will notify tribes that may be affected by proposed actions when section 7 consultation is initiated. For more information, please contact our Tribal Coordinator, John Nystedt, at 928/556-2160 or John.Nystedt@fws.gov.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. Information on known species detections, special status species, and Arizona species of greatest conservation need, such as the western burrowing owl and the Sonoran desert tortoise (*Gopherus morafkai*) can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program (<https://www.azgfd.com/wildlife/planning/projevalprogram/>).

We appreciate your concern for threatened and endangered species. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office. If we may be of further assistance, please contact our Flagstaff office at 928/556-2118 for projects in northern Arizona, our general Phoenix number 602/242-0210 for central Arizona, or 520/670-6144 for projects in southern Arizona.

Sincerely,
/s/

Heather Whitlaw
Field Supervisor
Attachment

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
 - Wetlands
-

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arizona Ecological Services Field Office

9828 North 31st Ave

#c3

Phoenix, AZ 85051-2517

(602) 242-0210

PROJECT SUMMARY

Project Code: 2023-0075135

Project Name: Old Pascua

Project Type: Co-location of Towers

Project Description: proposed collocation on an existing 80' tall self-supporting lattice tower

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.2480463,-110.98607135366794,14z>



Counties: Pima County, Arizona

ENDANGERED SPECIES ACT SPECIES

There is a total of 7 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Ocelot <i>Leopardus (=Felis) pardalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4474	Endangered

BIRDS

NAME	STATUS
California Least Tern <i>Sterna antillarum browni</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8104	Endangered
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

REPTILES

NAME	STATUS
Sonoyta Mud Turtle <i>Kinosternon sonoriense longifemorale</i> There is final critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/7276	Endangered

FISHES

NAME	STATUS
Gila Chub <i>Gila intermedia</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/51	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

FLOWERING PLANTS

NAME	STATUS
Huachuca Water-umbel <i>Lilaeopsis schaffneriana</i> var. <i>recurva</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1201	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\) list](#) or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Oct 15 to Aug 31
Black-chinned Sparrow <i>Spizella atrogularis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9447	Breeds Apr 15 to Jul 31

NAME	BREEDING SEASON
Costa's Hummingbird <i>Calypte costae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9470	Breeds Jan 15 to Jun 10
Gila Woodpecker <i>Melanerpes uropygialis</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5960	Breeds Apr 1 to Aug 31
Gilded Flicker <i>Colaptes chrysoides</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2960	Breeds May 1 to Aug 10
Grace's Warbler <i>Dendroica graciae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds May 20 to Jul 20
Lawrence's Goldfinch <i>Carduelis lawrencei</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9464	Breeds Mar 20 to Sep 20
Rufous-winged Sparrow <i>Aimophila carpalis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jun 15 to Sep 30
Western Grebe <i>aechmophorus occidentalis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743	Breeds Jun 1 to Aug 31
Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see



Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

MIGRATORY BIRDS FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#)

may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
-

2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities,

should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

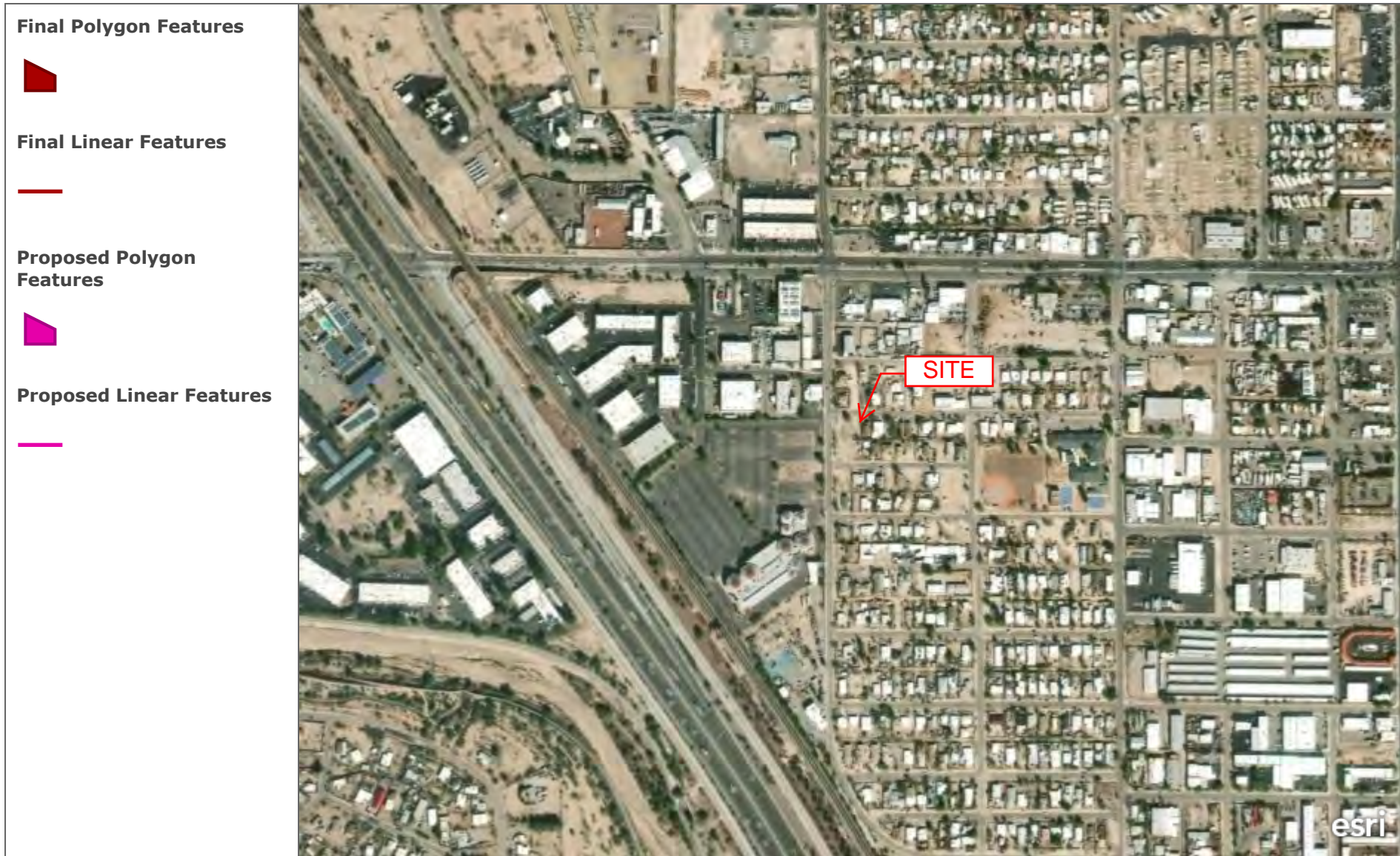
Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Environmental Corporation of America
Name: Shannon Lowman
Address: 1375 Union Hill Industrial Ct
Address Line 2: Suite A
City: Alpharetta
State: GA
Zip: 30004
Email: shannon.lowman@eca-usa.com
Phone: 7706672040

Critical Habitat for Threatened & Endangered Species [USFWS]



A specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

600ft

Maxar

ATTACHMENT E

Resume



Hazel Errett

Senior Environmental Scientist/Program Manager
1340 Patton Avenue, Suite K, Asheville, NC 28806
(828) 505-0755
hazel.errett@eca-usa.com

EDUCATION

University of North Carolina at Asheville

Bachelor of Science, Environmental Studies, December 2016

Asheville, NC

CURRENT EXPERIENCE

Environmental Corporation of America

May 2017 – Present

Position: Project Scientist

Responsibilities:

- Preparation of FCC National Environmental Policy Act (NEPA) Checklist and Environmental Assessment (EA) evaluations for proposed telecommunications facilities
- Preparation of USFWS requests for technical assistance, Informal Biological Assessments (IBA), and species-specific surveys – Identify potential habitat that may or may not be located within a project area for species listed by the USFWS as “Threatened” or “Endangered”
- Osprey/Bald Eagle Nest Investigations to determine activity status of reported osprey or bald eagle nests on telecommunications towers
- Preparation of Phase I and Phase II Environmental Site Assessments (ESAs) to determine whether or not a “recognized environmental condition” (REC) is present in connection with the Property in accordance with ASTM E1527-13
- Section 106 Review Documentation/Archaeological Assessments for Telecommunications Projects

Asheville, NC

REPRESENTATIVE EXPERIENCE

Migratory Bird Nest Evaluation/Monitoring

Determine activity status of reported migratory bird nests to recommendations regarding timing and planning construction, installation, and/or maintenance activities can be made. Monitoring construction/maintenance activities in close proximity to occupied nests so actions are within applicable regulatory guidelines.

Phase I Environmental Site Assessments

Project Manager, Participation in Alabama, Florida, Indiana, Kentucky, Missouri, North Carolina, Oklahoma, South Carolina, and Tennessee

Section 106 Review

Project Manager, Participation in numerous Section 106 reviews in Alabama, Florida, Kentucky, Missouri, North Carolina, and Oklahoma.

Federal Communications Commission NEPA Assessments

Project Manager and/or Project Scientist, Participation in Alabama, Florida, Kentucky, Missouri, North Carolina, and Oklahoma.

Protected Species Evaluations/ USFWS and State Wildlife Agency Consultations

Project Manager and/or Project Scientist, Participation in numerous projects within the United States.

Ryan Edson

From: cboucher@azgfd.gov on behalf of Project Evaluation Program - Game and Fish <pep@azgfd.gov>
Sent: Tuesday, August 15, 2023 7:49 PM
To: Ryan Edson
Subject: Re: Project Evaluation Requests

Hi Ryan,

As the proposed project is located in a previously disturbed area, with the present habitat providing relatively low value to wildlife, the Department does not anticipate any significant adverse impacts to wildlife resources would occur as a result of this project.

This email serves as our official response.

Thank you for the opportunity to review this project.

If you have any questions regarding this letter, please feel free to contact me.

CHERI BOUCHÉR | PROJECT EVALUATION PROGRAM SPECIALIST
ARIZONA GAME AND FISH DEPARTMENT

OFFICE: 623-236-7615

EMAIL: cboucher@azgfd.gov

azgfd.gov | 5000 W. Carefree Highway, Phoenix, AZ 85086

Join our new [Conservation Membership](#) program and ensure a wildlife legacy for the future.

On Wed, Jun 28, 2023 at 11:28 AM Ryan Edson <ryan.edson@eca-usa.com> wrote:

Hello,

Please see the attached project evaluation request for sites within Pima, Pinal, and Maricopa counties.

Thanks!

Ryan Edson (he/him)

Client Manager/Senior NEPA Specialist

Environmental Corporation of America (ECA)

678-477-4509 (Mobile/Remote)

ryan.edson@eca-usa.com

www.eca-usa.com



ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | ECOLOGY | CULTURAL RESOURCES

June 28, 2023

Arizona Department of Game and Fish
Project Evaluation Program
5000 W. Carefree Highway
Phoenix, AZ 85086-5000

Attention: Ms. Ginger Ritter
Project Evaluation Supervisor

Subject: Proposed Collocation/Modification of Antennas on an Existing 70-Foot Monopole Telecommunications Structure with Ground Disturbance
Native Networks Site Old Pascua
856 W Calle Santa Ana
Tucson, Pima County, Arizona
Latitude: N 32° 14' 53.3" Longitude: W 110° 59' 9.7"
ECA Project Number: 23-001203

Dear Ms. Ritter:

Environmental Corporation of America (ECA) is assisting Native Networks with National Telecommunications and Information Administration (NTIA) National Environmental Policy Act (NEPA) documentation for the proposed project.

The purpose of this letter is to request Arizona Game and Fish Department (AGF) comments relative to the potential effects of the proposed project on sensitive natural resources. ECA has utilized the Arizona On-line Environmental Review Tool and has completed a Project Evaluation Request Form. The generated report, completed form, and figures and photographs for the proposed project are attached to this letter.

For any questions or to request additional information, please contact Ryan Edson by phone at 770-667-2040, by email at ryan.edson@eca-usa.com, or by mail at 1375 Union Hill Industrial Court, Alpharetta, GA 30040.

Sincerely yours,
Environmental Corporation of America

A handwritten signature in black ink that reads 'Ryan Edson'.

Ryan Edson
Project Manager

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:

Native Networks Old Pascua

User Project Number:

23-001203

Project Description:

Modification of an existing approximate 80-foot self-supporting lattice telecommunications facility with proposed ground disturbance for associated equipment

Project Type:

Communication, Cell or communication tower including access roads, Modification to existing tower

Contact Person:

Ryan Edson

Organization:

ECA

On Behalf Of:

OTHER_FED

Project ID:

HGIS-19422

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. Arizona Wildlife Conservation Strategy (AWCS), specifically Species of Greatest Conservation Need (SGCN), 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.

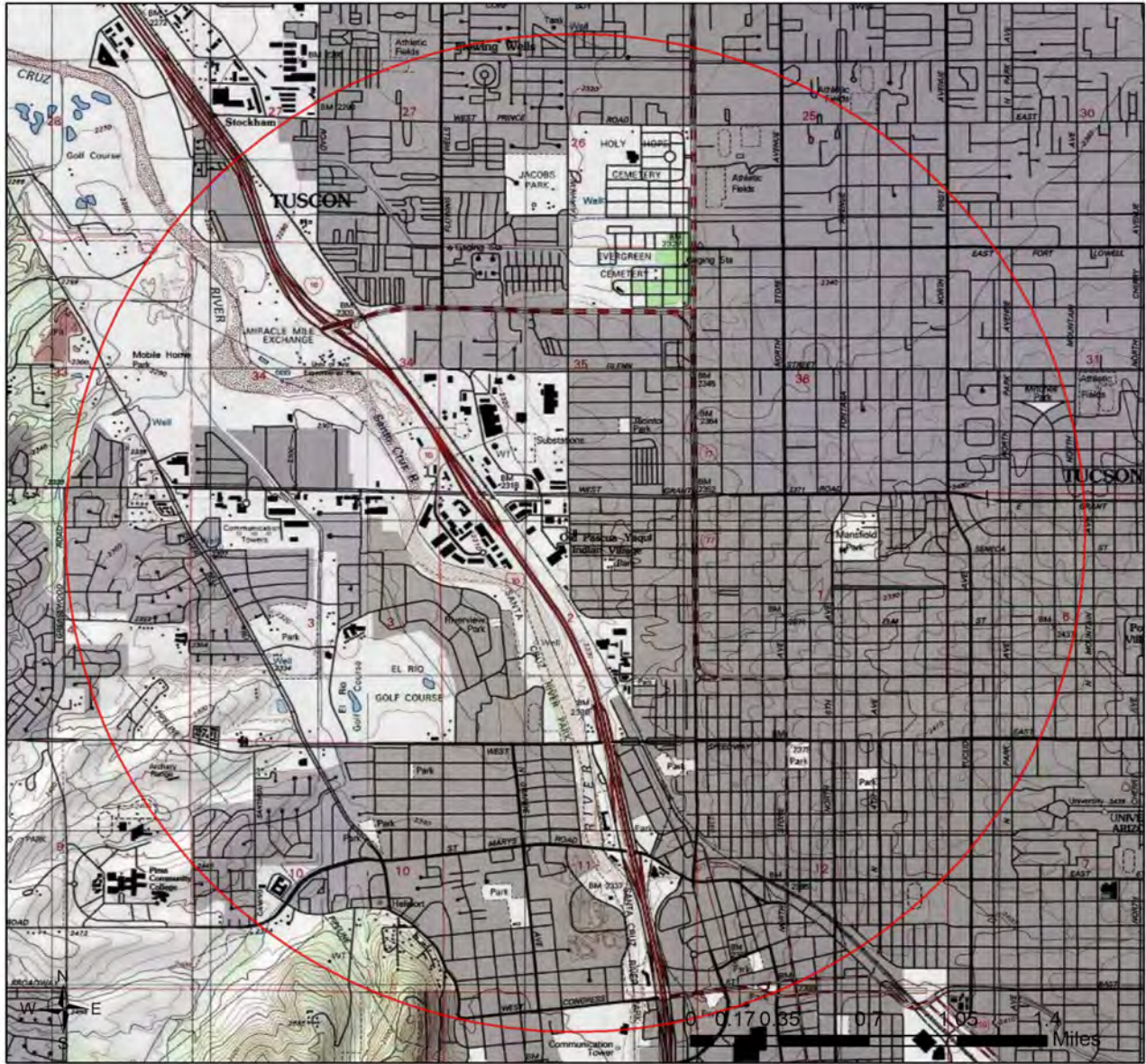
Locations Accuracy Disclaimer:

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

Native Networks Old Pascua USA Topo Basemap With Locator Map



- Buffered Project Boundary
- Project Boundary

Project Size (acres): 0.06

Lat/Long (DD): 32.2481 / -110.9861

County(s): Pima

AGFD Region(s): Tucson

Township/Range(s): T14S, R13E

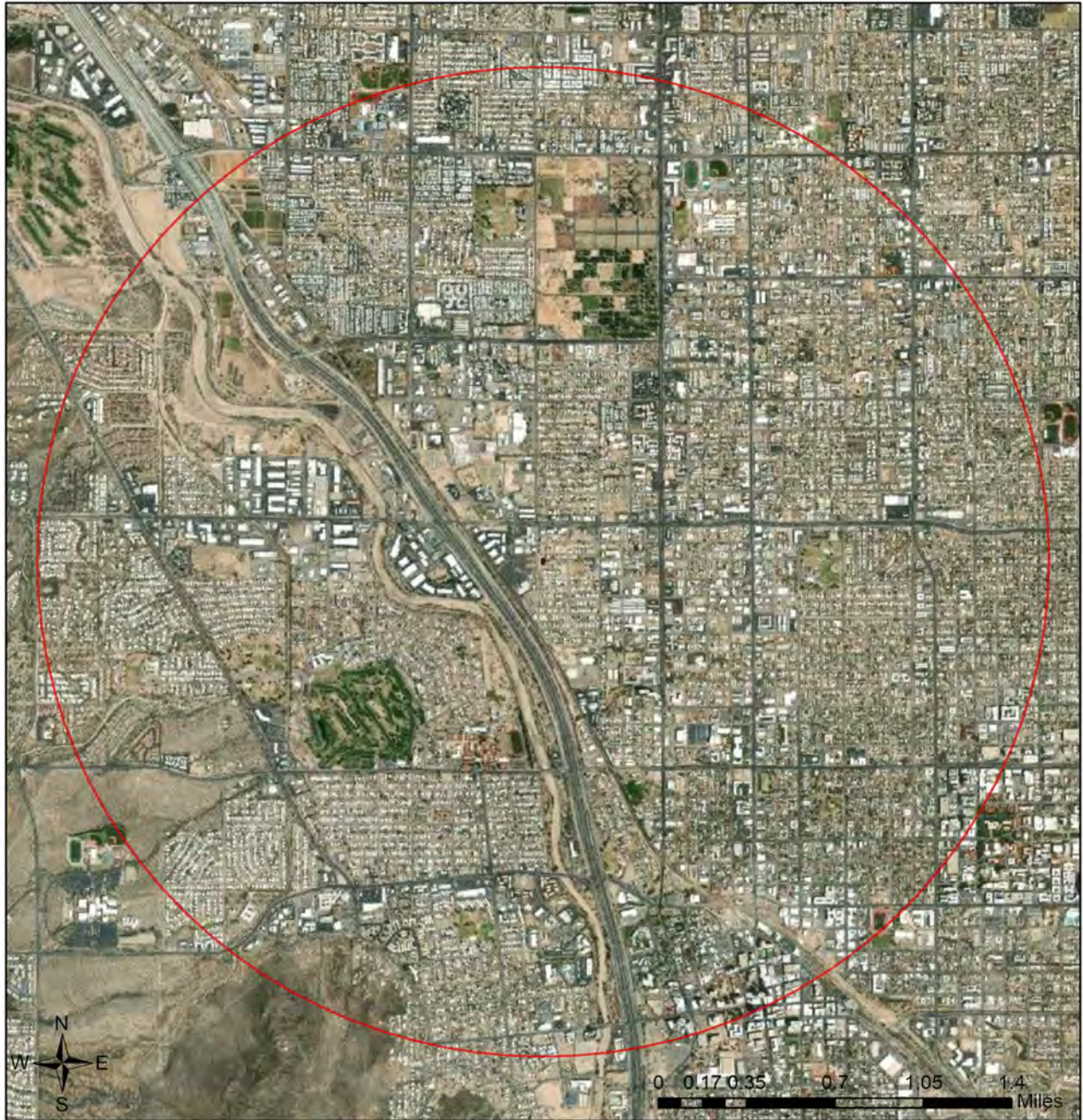
USGS Quad(s): TUCSON



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community



Native Networks Old Pascua

Web Map As Submitted By User

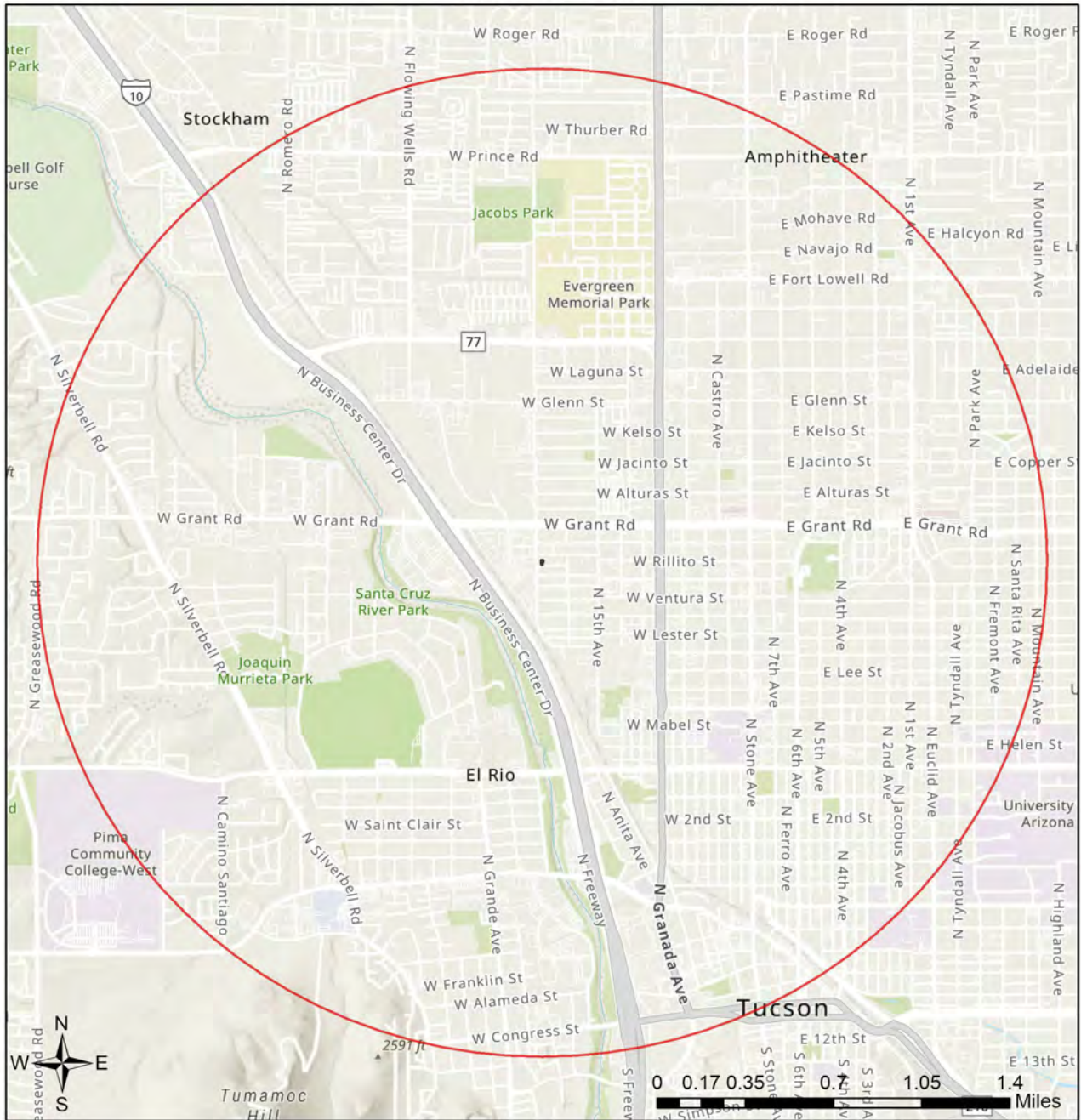


-  Buffered Project Boundary
-  Project Boundary

Project Size (acres): 0.06
Lat/Long (DD): 32.2481 / -110.9861
County(s): Pima
AGFD Region(s): Tucson
Township/Range(s): T14S, R13E
USGS Quad(s): TUCSON

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Native Networks Old Pascua Important Areas

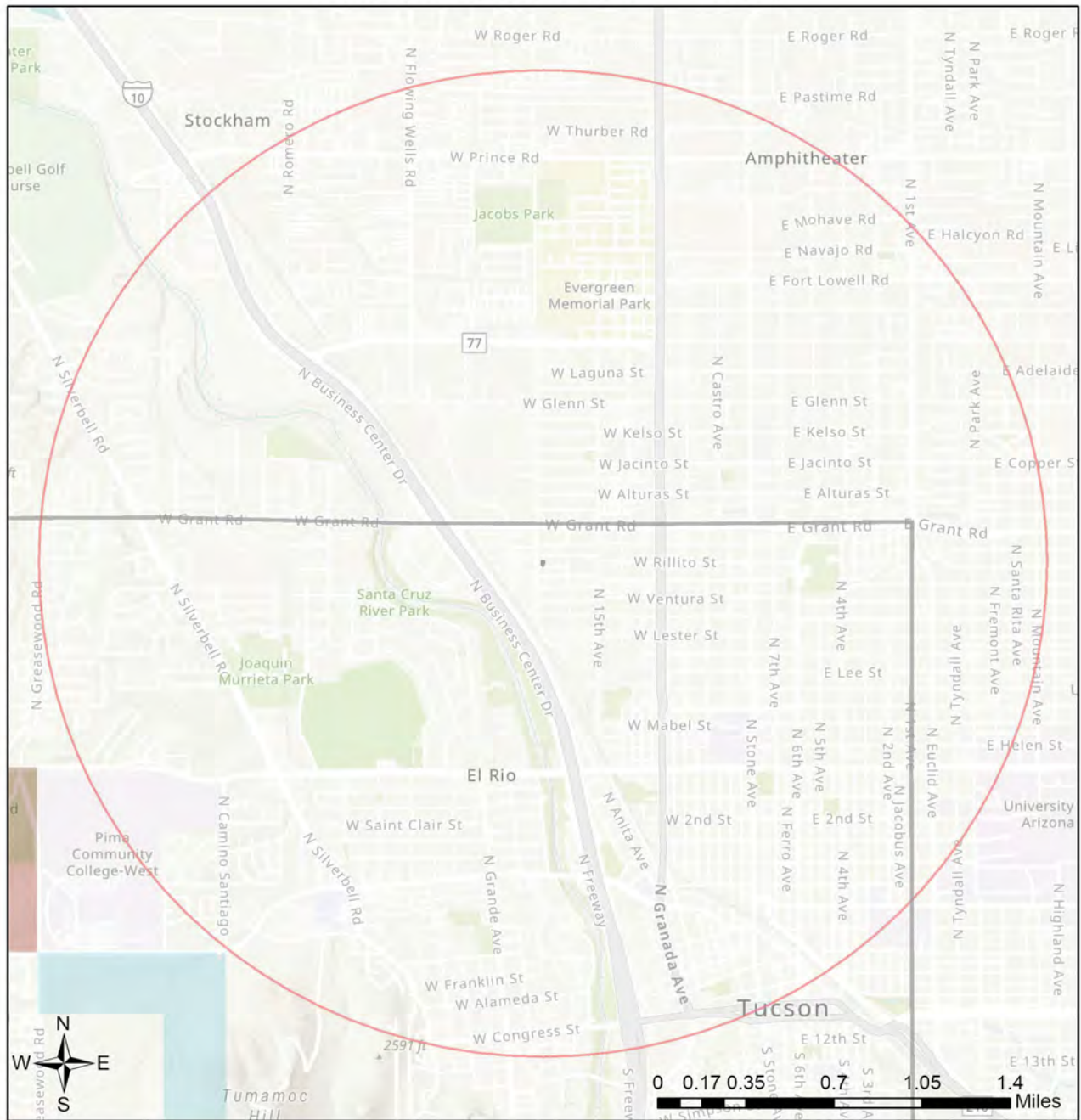


- Buffered Project Boundary
- Project Boundary
- Important Bird Areas
- Critical Habitat
- Pinal County Riparian
- Important Connectivity Zones
- Wildlife Connectivity

Project Size (acres): 0.06
 Lat/Long (DD): 32.2481 / -110.9861
 County(s): Pima
 AGFD Region(s): Tucson
 Township/Range(s): T14S, R13E
 USGS Quad(s): TUCSON

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Native Networks Old Pascua Township/Ranges and Land Ownership



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

Project Size (acres): 0.06
 Lat/Long (DD): 32.2481 / -110.9861
 County(s): Pima
 AGFD Region(s): Tucson
 Township/Range(s): T14S, R13E
 USGS Quad(s): TUCSON

Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community
 Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Special Status Species Documented within 2 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Agelaius phoeniceus	Red-winged Blackbird					2
Agosia chrysogaster chrysogaster	Gila Longfin Dace	SC		S		2
Aspidoscelis sonorae	Sonoran Spotted Whiptail					2
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		2
Auriparus flaviceps	Verdin					2
Bat Colony						
Calamospiza melanocorys	Lark Bunting					2
Calypte costae	Costa's Hummingbird					2
Campylorhynchus brunneicapillus	Cactus Wren					2
Cardinalis sinuatus	Pyrrhuloxia					2
Circus hudsonius	Northern Harrier					2
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S	S		1
Colaptes chrysoides	Gilded Flicker			S		2
Columbina inca	Inca Dove					2
Crotalus tigris	Tiger Rattlesnake					2
Cynanthus latirostris	Broad-billed Hummingbird		S			2
Danaus plexippus	Monarch	C		S		
Empidonax wrightii	Gray Flycatcher					2
Falco mexicanus	Prairie Falcon					2
Falco sparverius	American Kestrel					2
Gastrophryne mazatlanensis	Sinoloan Narrow-mouthed Toad				S	2
Gopherus morafkai	Sonoran Desert Tortoise	CCA	S	S		1
Heloderma suspectum	Gila Monster					1
Icterus bullockii	Bullock's Oriole					2
Incilius alvarius	Sonoran Desert Toad					2
Kinosternon sonoriense sonoriense	Desert Mud Turtle				S	2
Lanius ludovicianus	Loggerhead Shrike	SC				2
Melanerpes uropygialis	Gila Woodpecker					2
Melospiza lincolni	Lincoln's Sparrow					2
Melospiza aberti	Abert's Towhee		S			2
Melospiza fusca	Canyon Towhee					2
Parabuteo unicinctus	Harris's Hawk					2
Peucaea botterii arizonae	Arizona Botteri's Sparrow			S		2
Peucaea carpalis	Rufous-winged Sparrow					2
Phrynosoma solare	Regal Horned Lizard					2
Poeciliopsis occidentalis occidentalis	Gila Topminnow	LE		S		1
Poocetes gramineus	Vesper Sparrow					2
Rana yavapaiensis	Lowland Leopard Frog	SC	S	S		1
Spizella breweri	Brewer's Sparrow					2

Special Status Species Documented within 2 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Tadarida brasiliensis	Brazilian Free-tailed Bat					2
Toxostoma bendirei	Bendire's Thrasher					2
Tumamoca macdougallii	Tumamoc Globeberry	SC	S	S	SR	
Zonotrichia leucophrys oriantha	Mountain West White-crowned Sparrow					2

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

Special Areas Documented that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Santa Cruz River	Pima County Wildlife Movement Area - Riparian/Wash					

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

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Anthocharis cethura	Desert Orangetip					
Antrozous pallidus	Pallid Bat					
Aspidoscelis stictogramma	Giant Spotted Whiptail		S			2
Athene cucularia hypugaea	Western Burrowing Owl		S	S		2
Bat Colony						
Bat Foraging Area	High Netting Concentration					
Boerhavia megaptera	Tucson Mountain Spiderling					
Capsicum annuum var. glabriusculum	Chiltepin		S			
Chaetodipus intermedius	Rock Pocket Mouse					
Cheilanthes pringlei	Pringle's Lip Fern					
Chloroceryle americana	Green Kingfisher					
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)		S	S		1
Coleonyx variegatus	Western Banded Gecko					
Coryphantha scheeri var. robustispina	Pima Pineapple Cactus				HS	
Cuscuta odontolepis	Santa Rita Dodder					
Cynanthus latirostris	Broad-billed Hummingbird		S			2
Eptesicus fuscus	Big Brown Bat					
Eumops perotis californicus	Greater Western Bonneted Bat			S		2
Euphorbia gracillima	Mexican Broomspurge					
Gastrophryne mazatlanensis	Sinoloan Narrow-mouthed Toad			S		2

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Gopherus morafkai</i>	Sonoran Desert Tortoise		S	S		1
<i>Heloderma suspectum</i>	Gila Monster					1
<i>Ibervillea tenuisecta</i>	Texas Globe Berry					
<i>Lasiurus xanthinus</i>	Western Yellow Bat		S			2
<i>Lilaeopsis schaffneriana</i> ssp. <i>recurva</i>	Huachuca Water-umbel				HS	
<i>Lithobates yavapaiensis</i>	Lowland Leopard Frog		S	S		1
<i>Myotis velifer</i>	Cave Myotis			S		2
<i>Nyctinomops femorosaccus</i>	Pocketed Free-tailed Bat					2
<i>Opuntia versicolor</i>	Stag-horn Cholla				SR	
<i>Parabuteo unicinctus</i>	Harris's Hawk					2
<i>Parastrellus hesperus</i>	Canyon Bat					
<i>Sonorella magdalenensis</i>	Sonoran Talussnail		S	S		3
<i>Streptanthus carinatus</i>	Lyre-leaved Twistflower					
<i>Tadarida brasiliensis</i>	Brazilian Free-tailed Bat					2
<i>Trimorphodon lambda</i>	Sonoran Lyresnake					
<i>Tumamoca macdougallii</i>	Tumamoc Globeberry		S	S	SR	

Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Callipepla gambelii</i>	Gambel's Quail					
<i>Pecari tajacu</i>	Javelina					
<i>Puma concolor</i>	Mountain Lion					
<i>Zenaida asiatica</i>	White-winged Dove					
<i>Zenaida macroura</i>	Mourning Dove					

Project Type: Communication, Cell or communication tower including access roads, Modification to existing 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, canted, 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).

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 U.S. Fish and Wildlife Service (Migratory Bird Treaty Act) may be required (<https://www.fws.gov/office/arizona-ecological-services>).

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/sites/default/files/Native%20Plant%20Rules%20-%20AZ%20Dept%20of%20Ag.pdf> starts on page 44

Analysis indicates that your project is located in the vicinity of an identified **wildlife habitat connectivity feature**. The **County-level Stakeholder Assessments** contain five categories of data (Barrier/Development, Wildlife Crossing Area, Wildlife Movement Area- Diffuse, Wildlife movement Area- Landscape, Wildlife Movement Area- Riparian/Washes) that provide a context of select anthropogenic barriers, and potential connectivity. The reports provide recommendations for opportunities to preserve or enhance permeability. Project planning and implementation efforts should focus on maintaining and improving opportunities for wildlife permeability. For information pertaining to the linkage assessment and wildlife species that may be affected, please refer

to: <https://www.azgfd.com/wildlife/planning/habitatconnectivity/identifying-corridors/>.

Please contact the Project Evaluation Program (pep@azgfd.gov) for specific project recommendations.

HDMS records indicate that one or more **Listed, Proposed, or Candidate** species or **Critical Habitat** (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at <https://www.fws.gov/office/arizona-ecological-services> or:

Phoenix Main Office

9828 North 31st Avenue #C3
Phoenix, AZ 85051-2517
Phone: 602-242-0210
Fax: 602-242-2513

Tucson Sub-Office

201 N. Bonita Suite 141
Tucson, AZ 85745
Phone: 520-670-6144
Fax: 520-670-6155

Flagstaff Sub-Office

SW Forest Science Complex
2500 S. Pine Knoll Dr.
Flagstaff, AZ 86001
Phone: 928-556-2157
Fax: 928-556-2121

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/>

HDMS records indicate that **Western Burrowing Owls** have been documented within the vicinity of your project area. Please review the western burrowing owl resource page at:

<https://www.azgfd.com/wildlife/speciesofgreatestconservneed/burrowingowlmanagement/>.

Project Evaluation Request
Arizona Game and Fish Department

Notice: In order to obtain a review of your project, we require all of the information requested on this form to be provided. This review is free of charge. However, due to staff and budgetary constraints, we ask you to submit this form early in the process, as estimated turn around time is 30 days (if you need this review in less than 30 days, please include a needed by date and we will try to accommodate your request). This request is a preliminary review and further project review should include draft documents and a letter formally requesting further environmental review.

Project Evaluation Objectives:

Habitat Evaluation incorporates fish and wildlife resource needs or features in land and water development projects and land and water management planning efforts in Arizona.

Habitat Protection ensures habitat protection through environmental compliance and regulation, and to monitor the implementation and effectiveness of mitigation commitments for various land and water development projects and management planning activities in Arizona.

Instructions:

The following is required to process the request

- Completed form
- Map(s) delineating the project area (preferably a USGS quadrangle map)
- Relevant attachments (other supportive documents, photographs, etc.)

Send to:

Arizona Game and Fish Department
 Project Evaluation Program, WMHB
 5000 W Carefree Highway
 Phoenix, Arizona 85086
 Fax: 623-236-7366
 Email: PEP@azgfd.gov

Proposed Project Information

Project Name and/or Identification Number:

Date of Request:

What is the proposed date you intend to begin work on the project?

Applicant Requesting Project Evaluation

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Individual/Organization/Agency Proposing Project (if different from above)

Name:

Organization:

Street Address:

City:

State:

Zip Code:

E-mail:

Telephone Number:

Fax Number:

Location of Proposed Project *Remember to attach a topographic and/or plat map delineating the project area*

County(ies):

Township(s):

Range(s):

Section(s):

Proposed Project Information (continued)

Please briefly describe the project and project activities.

Briefly describe current land uses and habitat types in the project area.

List any waterbodies such as rivers, intermittent streams, lakes, or wetlands within or near the project area. Xeric washes should also be described, along with any anticipated impacts as a result of the project.

List any reports that have been prepared to describe the habitat that will be affected by the proposed project (e.g. habitat reconnaissance surveys, wetland delineation, etc.)

List any other resources or reviews that relate to the proposed project (correspondence, other phases of the project, other alternatives, etc.)

List any permits, licenses, or regulatory approvals you have or plan on applying for, or have already received as part of this project.

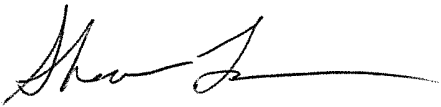

Return as hard copy to AZ Game & Fish Dept., Project Evaluation Program-Habitat Branch, 5000 W Carefree Highway, Phoenix, AZ 85086 or via email to pep@azgfd.gov or fax 623-236-7366

Appendix F
Historic and Cultural Resources

SHPO Consultation

Coolidge Tower Site

Grant Applicant: Pascua Yaqui Tribe	Consulting Firm: Environmental Corporation of America	
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004	Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057	
Contact Email Address: shannon.lowman@eca-usa.com	Contact Phone: 404-345-2301	
Project Description: (e.g., full description; extent of any ground disturbing activities) Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to construct a 75-foot tall (overall height) monopole telecommunications structure and associated ground equipment within a proposed approximate 40-foot by 40-foot (12-meter by 12-meter) fenced tower compound. The project would also include a proposed approximate 130-foot long (40-meter) buried fiber route.		
Describe Area of Potential Effects (APE): (include acreage, dimensions, utility corridors, access roads, staging areas) The APE would include a proposed 40-foot by 40-foot (12-meter by 12-meter) fenced tower compound and a proposed 130-foot long (40-meter) buried fiber route, which would total approximately 0.04 acres (0.02 hectares).		
Land Jurisdiction(s): The proposed project would be on privately owned land	Legal Description (Township, Range, & Section): Township 5S, Range 8E, NW ¼ of the SW ¼ of Section 22	
USGS Quad(s): Coolidge, AZ (1992)	UTM Coordinates: 451349 m E 3648887 m N	
Project Type: <input type="checkbox"/> New broadband installation (with ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (no ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (with ground disturbance) <input checked="" type="checkbox"/> New telecommunication facility/tower <input type="checkbox"/> Other:		Type of Investigation Conducted <input type="checkbox"/> Class I Inventory <input checked="" type="checkbox"/> Class III Survey <input type="checkbox"/> No Survey (no ground disturbance only)
Tribes Contacted for this Undertaking: (provide list; note any tribal concerns) ECA will be adhering to the NTIA's tribal consultation requirements and utilizing TCNS and the AZ G2G Toolkit to initiate tribal consultation.		
Cultural Resources: Cultural Resources Present? (Any prehistoric or historic [50+ years old] archaeological sites or historic structures regardless of NRHP-eligibility) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No Historic Properties Present? (Any prehistoric or historic site, district, building, structure, or object listed in, eligible for listing in the NRHP or whose NRHP eligibility is unevaluated) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No		
List of Cultural Resources: (add rows as necessary or attach report)		

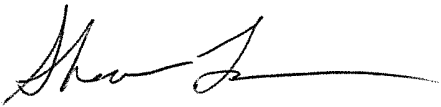
Grant Applicant: Pascua Yaqui Tribe		Consulting Firm: Environmental Corporation of America	
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004		Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057	
Site Number/ Address	Affiliation/ Construction Date	Site Type	NRHP Eligibility Status
See attached SRSF	for Cultural	Resources outside of	Direct APE
Name of Historic District or Neighborhood Project in which the APE is Located or Immediately Adjacent to (if applicable): Within <input type="checkbox"/> Adjacent <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> (check one)			
Responsible Party Signature and Date: 7/28/2023 			
SHPO Response			
Finding of Effect <input type="checkbox"/> No Historic Properties Affected <input checked="" type="checkbox"/> No Adverse Effect <input type="checkbox"/> Adverse Effect			
<p>We remind the applicant and NTIA that the views of Indian tribes are based on expertise and information not available and/or possessed by our staff, but are critical to informing the Section 106 review process. The applicant/NTIA remains responsible for consulting with and considering the views of Indian tribes. We request that applicant/NTIA provide our office with a summary of any views conveyed by Indian tribes that are not in agreement with SHPO's response, and in so doing SHPO reserves the right to exercise our responsibility to respond to new information and modify our findings, as necessary.</p> <p>Please inform SHPO of any tribal concerns; if you have no response from Tribes, please follow up with a phone call or email; do not assume there is no response.</p> <p>Additional SHPO comments: Clarification: the Vah Ki Inn and the Pima Masonic Lodge No. 39 were previously determined ineligible individually for inclusion in the NRHP.</p>			
SHPO Signature and Date: 			8/22/2023

*Submit this form and supporting documents to azshpo@azstateparks.gov.

**For additional information regarding NTIA projects, please see the NTIA-SHPO Section 106 guidance on our website under azstateparks.com/shpo-forms-and-publications.

NTIA - ARIZONA SHPO
Section 106 Consultation Form
Effective June 2023

Grant Applicant: Pascua Yaqui Tribe	Consulting Firm: Environmental Corporation of America
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004	Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057
Contact Email Address: shannon.lowman@eca-usa.com	Contact Phone: 404-345-2301
Project Description: <i>(e.g., full description; extent of any ground disturbing activities)</i> Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to construct a 75-foot tall (overall height) monopole telecommunications structure and associated ground equipment within a proposed approximate 40-foot by 40-foot (12-meter by 12-meter) fenced tower compound. The project would also include a proposed approximate 130-foot long (40-meter) buried fiber route.	
Describe Area of Potential Effects (APE): <i>(include acreage, dimensions, utility corridors, access roads, staging areas)</i> The APE would include a proposed 40-foot by 40-foot (12-meter by 12-meter) fenced tower compound and a proposed 130-foot long (40-meter) buried fiber route, which would total approximately 0.04 acres (0.02 hectares).	
Land Jurisdiction(s): The proposed project would be on privately owned land	Legal Description (Township, Range, & Section): Township 5S, Range 8E, NW ¼ of the SW ¼ of Section 22
USGS Quad(s): Coolidge, AZ (1992)	UTM Coordinates: 451349 m E 3648887 m N
Project Type: <input type="checkbox"/> New broadband installation (with ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (no ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (with ground disturbance) <input checked="" type="checkbox"/> New telecommunication facility/tower <input type="checkbox"/> Other:	Type of Investigation Conducted <input type="checkbox"/> Class I Inventory <input checked="" type="checkbox"/> Class III Survey <input type="checkbox"/> No Survey (no ground disturbance only)
Tribes Contacted for this Undertaking: <i>(provide list; note any tribal concerns)</i> ECA will be adhering to the NTIA's tribal consultation requirements and utilizing TCNS and the AZ G2G Toolkit to initiate tribal consultation.	
Cultural Resources: Cultural Resources Present? (Any prehistoric or historic [50+ years old] archaeological sites or historic structures regardless of NRHP-eligibility) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No Historic Properties Present? (Any prehistoric or historic site, district, building, structure, or object listed in, eligible for listing in the NRHP or whose NRHP eligibility is unevaluated) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
List of Cultural Resources: <i>(add rows as necessary or attach report)</i>	

Grant Applicant: Pascua Yaqui Tribe		Consulting Firm: Environmental Corporation of America	
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004		Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057	
Site Number/ Address	Affiliation/ Construction Date	Site Type	NRHP Eligibility Status
See attached SRSF	for Cultural	Resources outside of	Direct APE
Name of Historic District or Neighborhood Project in which the APE is Located or Immediately Adjacent to (if applicable): Within <input type="checkbox"/> Adjacent <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> (check one)			
Responsible Party Signature and Date: 7/28/2023 			
SHPO Response			
Finding of Effect <input type="checkbox"/> No Historic Properties Affected <input type="checkbox"/> No Adverse Effect <input type="checkbox"/> Adverse Effect			
<p>We remind the applicant and NTIA that the views of Indian tribes are based on expertise and information not available and/or possessed by our staff, but are critical to informing the Section 106 review process. The applicant/NTIA remains responsible for consulting with and considering the views of Indian tribes. We request that applicant/NTIA provide our office with a summary of any views conveyed by Indian tribes that are not in agreement with SHPO's response, and in so doing SHPO reserves the right to exercise our responsibility to respond to new information and modify our findings, as necessary.</p> <p>Please inform SHPO of any tribal concerns; if you have no response from Tribes, please follow up with a phone call or email; do not assume there is no response.</p> <p>Additional SHPO comments:</p>			
SHPO Signature and Date:			

*Submit this form and supporting documents to azshpo@azstateparks.gov.

**For additional information regarding NTIA projects, please see the NTIA-SHPO Section 106 guidance on our website under azstateparks.com/shpo-forms-and-publications.

Attachment A

Class III Cultural Resources Survey Report Summary Form

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

1

1. REPORT TITLE

1a. Report Title: A Class III Cultural Resources Survey of a Proposed 75-Foot Overall Height Monopole Telecommunications Structure, Coolidge, Pinal County, Arizona

1b. Report Author(s): Shannon Lowman, MA, RPA and Joshua Wackett, MA, RPA

1c. Date: July 28, 2023 **1d. Report No.:** 23-001191

2. PROJECT REGISTRATION/PERMITS

2a. ASM Accession Number: NA

2b. AAA Permit Number: NA

2c. ASLD Lease Application Number(s): NA

2d. Other Permit Number(s): NA

3. ORGANIZATION/CONSULTING FIRM

3a. Name: Environmental Corporation of America

3b. Internal Project Number: 23-001191

3c. Internal Project Name: Coolidge Tower Site

3d. Contact Name: Shannon Lowman

3e. Contact Address: 1375 Union Hill Industrial Court, Alpharetta, GA 30004

3f. Contact Phone: 770-667-2040 (office); 404-345-2301 (cell-preferred)

3g. Contact Email: shannon.lowman@eca-usa.com

4. SPONSOR/LEAD AGENCY

4a. Sponsor: National Telecommunications and Information Administration

4b. Lead Agency: National Telecommunications and Information Administration

4c. Agency Project Number(s): NA

4d. Agency Project Name: NA

4e. Funding Source(s): Federal Broadband Grant (National Telecommunications and Information Administration)

4f. Other Involved Agencies: AZ SHPO, Federal Communications Commission

4g. Applicable Regulations: Section 106 of the National Historic Preservation Act

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

5. DESCRIPTION OF PROJECT OR UNDERTAKING: Environmental Corporation of America's (ECA) client, Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to construct a 75-foot tall (overall height) monopole telecommunications structure located at 341 W Central Avenue, Coolidge, Pinal County, Arizona. The proposed undertaking would occur on land that is privately owned. ECA understands that the proposed project is grant-funded and administered through the National Telecommunications and Information Administration (NTIA). ECA understands that Native Network, Inc (on behalf of the Pascua Yaqui Tribe) plans to construct a 75-foot tall overall height monopole telecommunications structure within a proposed 40-foot by 40-foot (12-meter by 12-meter) tower compound. The project would also include a proposed approximate 130-foot long (40-meter) buried fiber route. The total Direct APE is approximately 1,730 square feet (0.04 acres).

6. PROJECT AREA/AREA OF POTENTIAL EFFECTS: The APE for Direct Effects (Direct APE) is defined as that area that would be directly impacted by the construction and operating activities associated with the proposed undertaking. The total Direct APE is approximately 1,730 square feet (0.04 acres). The APE for Visual Effects (Visual APE) is the geographic area or areas within which the facility may directly or indirectly cause alterations in the character or use of historic properties. ECA has defined the visual APE as a half mile radius surrounding the proposed tower structure. The new telecommunications structure will have an overall height of 75 feet.

7. PROJECT LOCATION

7a. Address: 341 W Central Avenue, Coolidge, Pinal County, Arizona

7b. Route: NA

7c. Mileposts Limits: NA

7d. Nearest City/Town: Coolidge **7e. County:** Pinal

7f. Project Locator UTM: 451349 Easting 3648887 Northing **7g. NAD 83** **7h. Zone:** 12N

7i. Baseline & Meridian: G&SRB&M **7j. USGS Quadrangle(s):** Coolidge, AZ

7k. Legal Description(s): NW ¼ of SW ¼ of Section 22, Township 5 South, Range 8 East

7l. Land Ownership: Privately owned

8. SURVEY AREA

8a. Total Acres: 0.04

8b. Survey Area.

1. Land Jurisdiction	2. Total Acres Surveyed	3. Total Acres Not Surveyed	4. Justification for Areas Not Surveyed
Privately owned	0.04 acres	0	NA

9. ENVIRONMENTAL CONTEXTS

9a. Landform: Valley of the Gila River

9b. Elevation: 1,430 feet above mean sea level

9c. Surrounding Topographic Features: The nearest topographic feature is the Gila River located approximately 3 miles (4.9 km) northeast of the Direct APE.

9d. Nearest Drainage: Pima Lateral approximately 1 mile (1.6 km) north of the Direct APE.

9e. Local Geology: The project area is located within the Basin and Range Physiographic Province of Arizona. With elongate mountain ranges and flat dry deserts, the Basin and Range region stretches from eastern California to central Utah and from southern Idaho into Mexico.

9f. Vegetation: The survey area is located within a commercially developed area. Vegetation includes landscaped bushes within the proposed tower compound and overgrown grasses along the proposed fiber route.

9g. Soils/Deposition: Soils located within the proposed project area include Laveen loam (NRCS). Laveen loam consists of very deep, well drained soils formed in mixed fan alluvium.

9h. Buried Deposits: Not likely

9i. Justification: No surface indications of potential buried deposits were observed within the Direct APE.

10. BUILT ENVIRONMENT: The Direct APE is located within a commercially developed area and is bordered by a dirt road to the south and a commercial building to the north.

11. INVENTORY CLASS COMPLETED

11a. Class I Inventory:

11b. Researcher(s): Joshua Wackett, Shannon Lowman

11c. Class II Survey:

11d Sampling Strategy: NA

11e. Class III Inventory:

12. BACKGROUND RESEARCH SOURCES

12a. AZSITE:

12b. ASM Archaeological Records Office:

12c. SHPO Inventories and/or SHPO Library:

12d. NRHP Database:

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

12e. ADOT Portal:

12f. GLO Maps:

12g. USGS Historic Maps:

12h. Land – Managing Agency Files: NA

12i. Tribal Cultural Resources Files: NA

12j. Local Government Websites: NA

12k. ADWR Well Registry:

12l. Mine Data:

12m. Other: Historic aerial imagery

13. BACKGROUND RESEARCH RESULTS

13a. Previous Projects Within Direct APE.

1. Project Reference Number	2. Project Name	3. Author(s)	4. Year
NA	NA	NA	NA

Records indicate that 18 survey projects have been previously completed within the 1/2-mile background research radius but outside the Direct APE.

13b. AZSITE-recorded Cultural Resources within the Direct APE.

1. Site Number/Name	2. Affiliation	3. Site Type	4. Eligibility Status	5. Associated Reference(s)
NA	NA	NA	NA	NA

No previously identified cultural resources were located within the Direct APE.

13c. Previous Projects Within the Visual APE.

1. Project Reference Number	2. Project Name	3. Author(s)	4. Year
SHPO-2001-656	Cultural Resource Survey for Nextel Communication Tower Project: Coolidge AZ 0193, Coolidge, Pinal County, Arizona	Kristen Winter, and A.E. Rogge	2001
62.-76.ASU	Unknown	Unknown	Unknown
2003-1422.ASM	Cultural Resources Survey at East Park, Coolidge, Pinal County, Arizona	Allison Cohen Diehl	2003
2007-752.ASM	Cultural Resources Survey for the Proposed Coolidge Transit Center, City of Coolidge, Pinal County, Arizona	Glennda Gene Luhnnow	2007

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

1. Project Reference Number	2. Project Name	3. Author(s)	4. Year
1999-587.ASM	Archaeological Survey for a Proposed Fiber Optic Line from Yuma to Phoenix, Arizona	David P. Doak	1999
2003-1311.ASM	Archaeological Monitoring for Construction of a Multiuse Path Along SR 87 Between Mileposts 133.22 and 134.75, Coolidge, Pinal County, Arizona.	Jackie Orcholl	2003
2006-800.ASM	A Cultural Resources Survey of 29 Acres Near Coolidge Avenue and Picacho Street, Coolidge, Pinal County, Arizona	Chris North	2006
2006-814.ASM	A Cultural Resources Survey of 138-Acres at the Southwest Corner of Vah Ki Inn and Christensen Roads in Coolidge, Pinal County, Arizona.	Cara Mitchell Douglas Bellavia	2006
2001-61.ASM	Nextel Communications Tower Project	A.E. Rogge	2001
2003-1430.ASM	A Cultural Resources Assessment Survey of Two Segments of State Route 87 (Mileposts 131.493-131.536 and 133.45-133.47) In Coolidge, Pinal County, Arizona	Karin Olsson	2003
2015-86.ASM	Historic Building Inventory and Assessment of Main Street: Coolidge Avenue to Pinkley Avenue and Central Avenue: Main Street to First Street, Coolidge, Pinal County, Arizona	Serelle E. Laine, and Hoski S. Schaafsma	2015
2004-627.ASM	Addendum D the GRIC Alternative B Reroute: A Cultural Resources Survey of a Supplemental Reroute to the Arizona Segment of the El Paso to Los Angeles Fiber Optic Cable Project	Daniel K. Newsome	2004
2011-476.ASM	A Class III Cultural Resources Survey and Historic Streetscape Assessment of Coolidge Avenue, Central Avenue, and Main Street, Coolidge, Pinal County, Arizona	Greta J. Rayle	2011
2017-119.ASM	A Class I Literature Review and Historic Building and Streetscape Inventory Survey for the Reconstruction of Coolidge Avenue Project, Pinal County, Coolidge, Arizona	Victoria D. Vargas and Thomas E. Jones	2017

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

13d. AZSITE-recorded Cultural Resources within the Visual APE.

1. Site Number/Name	2. Affiliation	3. Site Type	4. Eligibility Status	5. Associated Reference(s)
AZ AA:2:149 (ASM)/State Route 287	Late Historic (1900-1950)	Transportation roadway	Eligible Individually	Multiple
AZ AA:6:63 (ASM)/State Route 87	Late Historic (ca 1920s) and Recent (1954-1996)	Transportation roadway	Eligible Individually	Multiple
AZ T:10:84 (ASM)/Southern Pacific Railroad	Late Historic (1926)	Railroad track bed	Eligible Individually	Multiple

AZ AA:2:149(ASM) is located approximately 1,000 feet (305 m) west of the survey area and includes a Late Historic period roadway. The roadway has been determined as eligible for inclusion in the National Register of Historic Places (NRHP) (ASM 2023). Although the tower would be visible from certain locations along the roadway, there are several modern intrusions already within the viewshed. Given the existing modern intrusions, it is ECA’s opinion that the proposed undertaking would not diminish the existing setting of the resource. Therefore, it is ECA’s opinion that this resource would not be adversely affected by the proposed undertaking.

AZ AA:6:63(ASM) is located approximately 1,000 feet (305 m) west of the survey area and includes a Late Historic/Recent period roadway. The roadway has been determined as eligible for inclusion in the National Register of Historic Places (NRHP) (ASM 2023). Although the tower would be visible from certain locations along the roadway, there are several modern intrusions already within the viewshed. Given the existing modern intrusions, it is ECA’s opinion that the proposed undertaking would not diminish the existing setting of the resource. Therefore, it is ECA’s opinion that this resource would not be adversely affected by the proposed undertaking.

AZ T:10:84(ASM) is located approximately 1,600 feet (488 m) east of the survey area and includes a Late Historic period railroad. The railroad has been determined as eligible for inclusion in the National Register of Historic Places (NRHP) (ASM 2023). Although the tower would be visible from certain locations along the railroad bed, there are several modern intrusions already within the viewshed. Given the existing modern intrusions, it is ECA’s opinion that the proposed undertaking would not diminish the existing setting of the resource. Therefore, it is ECA’s opinion that this resource would not be adversely affected by the proposed undertaking.

No additional previously recorded sites have been documented within the Visual APE.

13e. Historic Buildings/Districts/Neighborhoods

1. Property Name or Address	2. Year	3. Eligibility Status
Pima Masonic Lodge No. 39	1930	Unevaluated by SHPO; ECA recommended ineligible
Vah Ki Inn	1957	Unevaluated by SHPO; ECA recommended ineligible

Although AZ SHPO has requested that all unevaluated resources be treated as NRHP eligible, ECA does not consider either resource to be eligible (see below explanation). Additionally, although the tower would be visible from both resources, there are several modern intrusions already within the existing viewshed for

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

7

each resource. Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting for either resource. Therefore, it is ECA's opinion that these two historic structures would not be adversely affected by the proposed undertaking.

Pima Masonic Lodge No. 39: Constructed in 1930, the building is a two-story, masonry vernacular structure set on a continuous brick foundation. Based on the available historic research, it is the opinion of ECA that the building is not eligible for the NRHP. The building once functioned as a Masonic Lodge, but due to limited membership it was abandoned by the Freemason's in 2008 with the closing of the local chapter. The building previously housed a hardware store on the first floor with lodge meeting space on the second floor. The original enframed storefront was later bricked in and then replaced again with the current glass window wall. Based on extensive exterior alterations and renovations, including the replacement of original windows, the alteration of the original enframed store front/entryway, and the lack of traditional masonic ornamentation the building does not retain sufficient architectural integrity. Additionally, the design is not reflective of any unique Freemason construction and is not the work of a master. As such, the building is not observed to be architecturally significant (Criterion C). Similar style vernacular masonic structures are found in various communities and across the country. The building was used for multiple commercial purposes and has no relation to any significant Freemason activities as seen elsewhere in the United States during this period. As the building is no longer associated with Freemason membership in Coolidge or its original use as a hardware store, combined with the exterior alterations, it no longer retains sufficient integrity to convey its historic function or significance. No information was uncovered to suggest the property is associated with events that have made a significant contribution to broad patterns of our history (Criterion A), lives of significant persons (Criterion B), or that it is likely to yield information important in history or prehistory (Criterion D). As such, it is the opinion of ECA that the building is not eligible for the NRHP.

Vah Ki Inn: *Vah Ki Inn* is plotted at 145 W. Central Avenue in Coolidge, Arizona based on the coordinates plotted for the resource in the AZ site database. According to the Pinal County Property Assessor, the building at that location was constructed in 1957 and was most recently known as Shorty's Sports Pub. It is located on the northern half of a rectangular parcel that fronts W. Central Avenue. The building consists of a one-story, mid-century structure with a square plan set on a concrete slab foundation. The building currently functions as a bar/tavern. It is the opinion of ECA that the Vah Ki Inn/Shorty's Sports Pub at 145 W. Central Avenue is not eligible for listing in the NRHP. Based on the architectural design, the minimal mid-century stylistic element represents a conventional design prevalent in 1960s commercial vernacular construction. While it possesses the fundamentals of mid-century architecture, it does not have enough of the distinctive characteristics of mid-century design to be considered a significant example of its type, period, or method of construction. Overall, it is a typical example of a mid-twentieth-century commercial building and represents a highly prevalent approach to architectural design in Arizona, as well as the United States in general. As such, the building is not observed to be architecturally significant (Criterion C). Additionally, the building does not appear to have ever been an inn for lodging, but rather functioned as a tavern. It appears that another resource also named the Vah-Ki Inn was located northwest of the proposed undertaking and outside of the visual APE closer to Casa Grande Ruins National Monument. As that Vah-Ki Inn, constructed ca. 1929, appears to be misplotted in the AZ site database and as it was located approximately a mile outside of the APE, it was not included as part of this assessment. No information was uncovered to suggest the property at 145 W. Central Avenue is associated with events that have made a significant contribution to broad patterns of our history (Criterion A), lives of significant persons (Criterion B), or that it is likely to yield information important in history or prehistory (Criterion D). As such, it is the opinion of ECA that the building is not eligible for the NRHP.

Historic Structure located on the proposed undertaking's parent parcel: According to the Pinal County Tax Assessor Parcel Viewer, the building on the parent tract was constructed in 1953 and

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

this building is first visible on 1956 aerial photographs. The project area has remained largely unchanged since that time. It is the opinion of ECA that the building on the subject parcel is not eligible for the NRHP. Based on the architectural design, the plain masonry vernacular building represents a conventional design prevalent to mid-century commercial architectural in the southwestern United States. Primarily a masonry building with no defined architectural style, the building attempts to replicate southwestern presidio design elements in a vernacular commercial setting with elements such as the courtyard and shed roof overhangs. The building does not have enough of the distinctive characteristics of the southwestern presidio design to be considered a significant example of its type, period, or method of construction. It has never functioned as anything other than commercial office space since the 1950s. Overall, it is a typical example of a mid-to-late-twentieth-century commercial architecture and represents a highly prevalent approach to architectural design in Arizona. As such, the building is not observed to be architecturally significant (Criterion C). No information was uncovered to suggest the property is associated with events that have made a significant contribution to broad patterns of our history (Criterion A), lives of significant persons (Criterion B), or that it is likely to yield information important in history or prehistory (Criterion D). As a result, it is the opinion of ECA that the building is not a historic property in the APE for direct or visual effects and that the historic structure would not be affected by the proposed undertaking.

13f. National Register of Historic Places (NRHP) Databases:

1. Property Name or Address	2. Year	3. Eligibility Status
Coolidge Woman’s Club	1928	Listed

The proposed tower would be visible from the NRHP listed *Coolidge Women’s Club*. However, there are modern overhead utilities and an already existing telecommunications tower within the viewshed of the Historic Property. Given the existing modern intrusions, it is ECA’s opinion that the proposed undertaking would not further alter the setting of the *Coolidge Women’s Club*. Therefore, it is ECA’s opinion that this resource would not be adversely affected by the proposed undertaking.

13g. USGS Historic Topographic Maps:

1. Map Name	2. Map Scale	3. Map Date	4. Cultural Features Within the APE
NA	NA	NA	NA

13h. General Land Office (GLO) Survey Plats and Land Patents: Historic (at least 50-year-old) GLO plats on file with the Bureau of Land Management (BLM) that overlap the Class III Study Area were reviewed (BLM 2023). No features intersect the Direct APE on 1869 GLO depicting Township 5 South, Range 8 East.

13i. Mineral Resource Data System (MRDS): NA

13j. Arizona Department of Water Resources (ADWR) Well Registry: NA

13k. Historic Aerial Imagery: According to aerial photographs, the APE for direct effects has been located just south of a commercial structure since at least 1956. The project area has remained largely unchanged since that time. No historic resources were identified within the APE for Direct Effects.

STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM

14. CULTURAL CONTEXTS

14a. Prehistoric Culture: Archaic, Early Agricultural, Hohokam

14b. Protohistoric Culture: Spanish, AD 1452 to 1700s

14c. Indigenous Historic Culture: Yaqui ; O'odham

14d. Euro-American Culture: AD 1700s to 1950s

15. FIELD SURVEY PERSONNEL

15a. Principal Investigator: Shannon Lowman

15b. Field Supervisor: Shannon Lowman

15c. Crew: NA

15d. Fieldwork Date(s): May 15, 2023

16. SURVEY METHODS

16a. Transect Intervals: 15-foot (5-meter)

16b. Coverage (%): 100

16c. Site Recording Criteria: Arizona State Museum

16d. Ground Surface Visibility: 0-100%

16e. Observed Disturbances: The ground surface of the Direct APE contained sparse vegetation, modern trash, gravel, and exposed earth.

17. FIELD SURVEY RESULTS

17a. No Cultural Resources Identified:

17b. Historical In-Use Structures Identified: ; **Form(s) Attached:**

17c. Number of IOs Recorded: 0

17d. Table of IOs.

1. IO Number	2. Description	3. Date Range	4. UTM's

STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM

18. VISUAL APE

18a. National Register Eligible Sites within 1/2-Mile Visual APE: 4

18b. National Register of Unevaluated Sites within 1/2-Mile Visual APE: 2

19. COMMENTS:

ECA has assessed the effects of the telecommunications facility on known historic properties.

Direct APE: No historic properties are located within the Direct APE. Accordingly, a finding of “No Historic Properties Affected” is recommended.

Visual APE: Six previously recorded cultural resources [*Coolidge Women’s Club* (NRHP# 90001524), *Pima Masonic Lodge No. 39*, *Vah Ki Inn*, AZ AA:2:149(ASM), AZ T:10:84(ASM), and AZ AA:6:63(ASM)] are present within the 1/2-mile visual APE. Four of the cultural resources have formally been determined eligible for listing in the NRHP by AZ SHPO while the remaining two cultural resources are unevaluated. ECA is of the opinion that the proposed tower would not further diminish the existing setting of any of the cultural resources. Accordingly, a finding of “No Adverse Effect” is recommended.

During the course of this Class III Cultural Resources Survey, no historic properties were located in the APE for direct effects. Further, although there are historic resources within the viewshed of the proposed undertaking, it is ECA's opinion that those resources would not be adversely affected. Therefore, we recommend a finding of “No Adverse Effect” for the proposed undertaking and request your concurrence with our finding.

SECTION 20. ATTACHMENTS

20a. Project Location Map:

20b. Direct APE Map:

20c. Site Vicinity Plan:

20d. Historic Aerials:

20e. GLO Map(s):

20f. References:

SECTION 20. CONSULTANT CERTIFICATION

I certify the information provided herein has been reviewed for content and accuracy and all work meets applicable agency standards.



Signature

Senior Archaeologist

Title



Signature

Principal Investigator

Title

Date: July 28, 2023

SECTION 21. DISCOVERY CLAUSE

In the event that previously unreported cultural resources are encountered during ground disturbing activities, all work must immediately cease within 30 meters (100 feet) until a qualified archaeologist has documented the discovery and evaluated its eligibility for the Arizona or National Register of Historic Places in consultation with the lead agency, the SHPO, and Tribes, as appropriate. Work must not resume in this area without approval of the lead agency.

If human remains are encountered during ground-disturbing activities, all work must immediately cease within 30 meters (100 feet) of the discovery and the area must be secured. The Arizona State Museum, lead agency, SHPO, and appropriate Tribes must be notified of the discovery. All discoveries will be treated in accordance with NAGPRA (Public Law 101-601; 25 U.S.C. 3001-3013) or Arizona Revised Statutes (A.R.S. § 41-844 and A.R.S. § 41-865), as appropriate, and work must not resume in this area without authorization from ASM and the lead agency.

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Guadalupe Tower Site

Grant Applicant: Pascua Yaqui Tribe	Consulting Firm: Environmental Corporation of America
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004	Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057
Contact Email Address: shannon.lowman@eca-usa.com	Contact Phone: 404-345-2301
Project Description: (e.g., full description; extent of any ground disturbing activities) Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to collocate a 20-foot tall non-penetrating roof mount antenna structure on an existing 30-foot tall building located at 9405 S Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona. No ground disturbance is currently proposed.	
Describe Area of Potential Effects (APE): (include acreage, dimensions, utility corridors, access roads, staging areas) The physical impact area of the proposed undertaking would consist of the Subject Building. The Subject building was constructed in 2013 and currently houses the Pascua Yaqui Tribal Complex.	
Land Jurisdiction(s): The proposed project would be on fee land that is owned by the Pascua Yaqui Tribe.	Legal Description (Township, Range, & Section): Township 1S, Range 4E, NW ¼ of the NW ¼ of Section 9
USGS Quad(s): Guadalupe, AZ (1952, photorevised 1982)	UTM Coordinates: 410508 m E 3691688 m N
Project Type: <input type="checkbox"/> New broadband installation (with ground disturbance) <input checked="" type="checkbox"/> Hardware on existing infrastructure (no ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (with ground disturbance) <input type="checkbox"/> New telecommunication facility/tower <input type="checkbox"/> Other:	Type of Investigation Conducted <input type="checkbox"/> Class I Inventory <input type="checkbox"/> Class III Survey <input checked="" type="checkbox"/> No Survey (no ground disturbance only)
Tribes Contacted for this Undertaking: (provide list; note any tribal concerns) ECA will be adhering to the NTIA's tribal consultation requirements and utilizing TCNS and the AZ G2G Toolkit to initiate tribal consultation.	
Cultural Resources: Cultural Resources Present? (Any prehistoric or historic [50+ years old] archaeological sites or historic structures regardless of NRHP-eligibility) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No Historic Properties Present? (Any prehistoric or historic site, district, building, structure, or object listed in, eligible for listing in the NRHP or whose NRHP eligibility is unevaluated) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
List of Cultural Resources: (add rows as necessary or attach report)	


Grant Applicant: Pascua Yaqui Tribe		Consulting Firm: Environmental Corporation of America	
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004		Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057	
Site Number/ Address	Affiliation/ Construction Date	Site Type	NRHP Eligibility Status
See attached SRSF	For Cultural	Resources outside of	Direct APE
Name of Historic District or Neighborhood Project in which the APE is Located or Immediately Adjacent to (if applicable): Within <input type="checkbox"/> Adjacent <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> (check one)			
Responsible Party Signature and Date: 7/28/2023 			
SHPO Response			
Finding of Effect <input type="checkbox"/> No Historic Properties Affected <input checked="" type="checkbox"/> No Adverse Effect <input type="checkbox"/> Adverse Effect			
<p>We remind the applicant and NTIA that the views of Indian tribes are based on expertise and information not available and/or possessed by our staff, but are critical to informing the Section 106 review process. The applicant/NTIA remains responsible for consulting with and considering the views of Indian tribes. We request that applicant/NTIA provide our office with a summary of any views conveyed by Indian tribes that are not in agreement with SHPO's response, and in so doing SHPO reserves the right to exercise our responsibility to respond to new information and modify our findings, as necessary.</p> <p>Please inform SHPO of any tribal concerns; if you have no response from Tribes, please follow up with a phone call or email; do not assume there is no response.</p> <p>Additional SHPO comments:</p>			
SHPO Signature and Date: 			8/25/2023

*Submit this form and supporting documents to azshpo@azstateparks.gov.

**For additional information regarding NTIA projects, please see the NTIA-SHPO Section 106 guidance on our website under azstateparks.com/shpo-forms-and-publications.

NTIA - ARIZONA SHPO
Section 106 Consultation Form
Effective June 2023

Grant Applicant: Pascua Yaqui Tribe	Consulting Firm: Environmental Corporation of America
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004	Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057
Contact Email Address: shannon.lowman@eca-usa.com	Contact Phone: 404-345-2301
Project Description: <i>(e.g., full description; extent of any ground disturbing activities)</i> Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to collocate a 20-foot tall non-penetrating roof mount antenna structure on an existing 30-foot tall building located at 9405 S Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona. No ground disturbance is currently proposed.	
Describe Area of Potential Effects (APE): <i>(include acreage, dimensions, utility corridors, access roads, staging areas)</i> The physical impact area of the proposed undertaking would consist of the Subject Building. The Subject building was constructed in 2013 and currently houses the Pascua Yaqui Tribal Complex.	
Land Jurisdiction(s): The proposed project would be on fee land that is owned by the Pascua Yaqui Tribe.	Legal Description (Township, Range, & Section): Township 1S, Range 4E, NW ¼ of the NW ¼ of Section 9
USGS Quad(s): Guadalupe, AZ (1952, photorevised 1982)	UTM Coordinates: 410508 m E 3691688 m N
Project Type: <input type="checkbox"/> New broadband installation (with ground disturbance) <input checked="" type="checkbox"/> Hardware on existing infrastructure (no ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (with ground disturbance) <input type="checkbox"/> New telecommunication facility/tower <input type="checkbox"/> Other:	Type of Investigation Conducted <input type="checkbox"/> Class I Inventory <input type="checkbox"/> Class III Survey <input checked="" type="checkbox"/> No Survey (no ground disturbance only)
Tribes Contacted for this Undertaking: <i>(provide list; note any tribal concerns)</i> ECA will be adhering to the NTIA's tribal consultation requirements and utilizing TCNS and the AZ G2G Toolkit to initiate tribal consultation.	
Cultural Resources: Cultural Resources Present? (Any prehistoric or historic [50+ years old] archaeological sites or historic structures regardless of NRHP-eligibility) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No Historic Properties Present? (Any prehistoric or historic site, district, building, structure, or object listed in, eligible for listing in the NRHP or whose NRHP eligibility is unevaluated) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
List of Cultural Resources: <i>(add rows as necessary or attach report)</i>	

Grant Applicant: Pascua Yaqui Tribe		Consulting Firm: Environmental Corporation of America	
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004		Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057	
Site Number/ Address	Affiliation/ Construction Date	Site Type	NRHP Eligibility Status
See attached SRSF	For Cultural	Resources outside of	Direct APE
Name of Historic District or Neighborhood Project in which the APE is Located or Immediately Adjacent to (if applicable): Within <input type="checkbox"/> Adjacent <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> (check one)			
Responsible Party Signature and Date: 7/28/2023 			
SHPO Response			
Finding of Effect <input type="checkbox"/> No Historic Properties Affected <input type="checkbox"/> No Adverse Effect <input type="checkbox"/> Adverse Effect			
We remind the applicant and NTIA that the views of Indian tribes are based on expertise and information not available and/or possessed by our staff, but are critical to informing the Section 106 review process. The applicant/NTIA remains responsible for consulting with and considering the views of Indian tribes. We request that applicant/NTIA provide our office with a summary of any views conveyed by Indian tribes that are not in agreement with SHPO's response, and in so doing SHPO reserves the right to exercise our responsibility to respond to new information and modify our findings, as necessary.			
Please inform SHPO of any tribal concerns; if you have no response from Tribes, please follow up with a phone call or email; do not assume there is no response.			
Additional SHPO comments: 			
SHPO Signature and Date:			

*Submit this form and supporting documents to azshpo@azstateparks.gov.

**For additional information regarding NTIA projects, please see the NTIA-SHPO Section 106 guidance on our website under azstateparks.com/shpo-forms-and-publications.

Attachment A

Class III Cultural Resources Survey Report Summary Form

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

1

1. REPORT TITLE

1a. Report Title: Proposed Collocation of Antennas on an Existing 30-Foot Tall Building, Guadalupe, Maricopa County, Arizona

1b. Report Author(s): Shannon Lowman, MA, RPA and Matthew Beazley, MA, RPA

1c. Date: July 28, 2023 **1d. Report No.:** 23-001205

2. PROJECT REGISTRATION/PERMITS

2a. ASM Accession Number: NA

2b. AAA Permit Number: NA

2c. ASLD Lease Application Number(s): NA

2d. Other Permit Number(s): NA

3. ORGANIZATION/CONSULTING FIRM

3a. Name: Environmental Corporation of America

3b. Internal Project Number: 23-001205

3c. Internal Project Name: Guadalupe Collocation Site

3d. Contact Name: Shannon Lowman

3e. Contact Address: 1375 Union Hill Industrial Court, Alpharetta, GA 30004

3f. Contact Phone: 770-667-2040 (office); 404-345-2301 (cell-preferred)

3g. Contact Email: shannon.lowman@eca-usa.com

4. SPONSOR/LEAD AGENCY

4a. Sponsor: National Telecommunications and Information Administration

4b. Lead Agency: National Telecommunications and Information Administration

4c. Agency Project Number(s): NA

4d. Agency Project Name: NA

4e. Funding Source(s): Federal Broadband Grant (National Telecommunications and Information Administration)

4f. Other Involved Agencies: AZ SHPO, Federal Communications Commission

4g. Applicable Regulations: Section 106 of the National Historic Preservation Act

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

5. DESCRIPTION OF PROJECT OR UNDERTAKING: Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to collocate a 20-foot tall non-penetrating roof mount antenna structure on an existing 30- foot tall building located at 9405 S Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona. No ground disturbance is currently proposed.

6. PROJECT AREA/AREA OF POTENTIAL EFFECTS: The physical impact area of the proposed undertaking would consist of the Subject Building. The Subject building was constructed in 2013 and currently houses the Pascua Yaqui Tribal Complex.

7. PROJECT LOCATION

7a. Address: 9405 S Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona

7b. Route: NA

7c. Mileposts Limits: NA

7d. Nearest City/Town: Guadalupe

7e. County: Maricopa

7f. Project Locator UTM: 410508 Easting 3691688 Northing **7g. NAD 83** **7h. Zone:** 12N

7i. Baseline & Meridian: G&SRB&M **7j. USGS Quadrangle(s):** Guadalupe, AZ

7k. Legal Description(s): NW ¼ of NW ¼ of Section 9, Township 1 South, Range 4 East

7l. Land Ownership: Fee Simple- Owned by the Pascua Yaqui Tribe

8. SURVEY AREA

8a. Total Acres: N/A

8b. Survey Area.

1. Land Jurisdiction	2. Total Acres Surveyed	3. Total Acres Not Surveyed	4. Justification for Areas Not Surveyed
Fee Simple- Pascua Yaqui Tribe	0 acres	0 acres- No Survey Needed	Collocation with no proposed ground disturbance

STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM

9. ENVIRONMENTAL CONTEXTS

9a. Landform: N/A- collocation

9b. Elevation: 1,248 feet above mean sea level

9c. Surrounding Topographic Features: N/A- collocation

9d. Nearest Drainage: N/A- collocation

9e. Local Geology: N/A- collocation

9f. Vegetation: N/A- collocation

9g. Soils/Deposition: N/A- collocation

9h. Buried Deposits: N/A- collocation

9i. Justification: N/A- collocation

10. BUILT ENVIRONMENT: The proposed collocation would be constructed on the roof of a Pascua Yaqui Government building that was constructed in 2013.

11. INVENTORY CLASS COMPLETED

11a. Class I Inventory:

11b. Researcher(s): NA

11c. Class II Survey:

11d Sampling Strategy: NA

11e. Class III Inventory:

12. BACKGROUND RESEARCH SOURCES

12a. AZSITE:

12b. ASM Archaeological Records Office:

12c. SHPO Inventories and/or SHPO Library:

12d. NRHP Database:

12e. ADOT Portal:

12f. GLO Maps:

12g. USGS Historic Maps:

12h. Land – Managing Agency Files: NA

12i. Tribal Cultural Resources Files: NA

12j. Local Government Websites: NA

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

12k. ADWR Well Registry:

12l. Mine Data:

12m. Other: Historic aerial imagery

13. BACKGROUND RESEARCH RESULTS

13a. Previous Projects Within Direct APE.

1. Project Reference Number	2. Project Name	3. Author(s)	4. Year
1995-368.ASM	Pasqua Yaqui Survey	SWCATUS	1995

Records indicate that 17 survey projects have been previously completed within the 1/2-mile background research radius. The remaining 16 survey projects are located outside the Direct APE.

13b. AZSITE-recorded Cultural Resources within the Direct APE.

1. Site Number/Name	2. Affiliation	3. Site Type	4. Eligibility Status	5. Associated Reference(s)
NA	NA	NA	NA	NA

No previously identified cultural resources were located within the Direct APE.

13c. Previous Projects Within the Visual APE.

1. Project Reference Number	2. Project Name	3. Author(s)	4. Year
1964-4.ASM	Summary Of Maricopa Co, AZ Sites	ASMAD	1964
1964-9.ASM	South Of Guadalupe	ASM	1964
1980-211.ASM	Proposed Aps Kyrene Ehv Transmission Line Project	ACS	1980
1987-222.ASM	U.S. Telecom Buried Fiber Optic Cable	DAMES	1987
1994-144.ASM	I-10/Baseline to Chandler	ARS	1994
1995-368.ASM	Pasqua Yaqui Survey	SWCATUS	1995
1998-183.ASM	Survey Of 4 Acres Near Calle Guadalupe and Calle Vauo Nawi	NTHLDFLG	1998
2000-99.ASM	Guadalupe Drainage Improvement (GDI) Inventory	SAS	2000
2001-184.ASM	Guadalupe Drainage Improvement '01 Inventory	SAS	2001

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

1. Project Reference Number	2. Project Name	3. Author(s)	4. Year
2001-234.ASM	Pascua Yaqui Survey	SWCASCT	2001
2004-625.ASM	Add.G: El Paso to Los Angeles Fiber Optic Cable Project: Elliot Road And Lower Buckeye Road Reroutes	SWCAFLG	2004
2005-482.ASM	Ramaker	TIERRA	2005
2009-645.ASM	Roadway Widening and Streetlight Installation	LSD	2009
2010-553.ASM	Guadalupe 4 Survey	TIERRA	2010
2014-257.ASM	W395-EE Absolute Storage	URS	2014
7.2296.SHPO	Unknown	N/A	Unknown
7.3231.SHPO	Archaeological Survey at The Projected Locations	N/A	Unknown

13d. AZSITE-recorded Cultural Resources within the Visual APE.

1. Site Number/Name	2. Affiliation	3. Site Type	4. Eligibility Status	5. Associated Reference(s)
AZ U:9:16(ASM)	Hohokam	Artifact scatter	Not Evaluated	NA
AZ U:9:17(ASM)	Hohokam	Artifact scatter	Not Evaluated	NA
AZ U:9:147(ASM)	12000BC-AD1500 Hohokam	Artifact scatter	SHPO Determined Ineligible	5301.ASM; 1545; Mitchell, Douglas R. 1995 An Archaeological Survey of a 23 Acre Parcel for Pascua Yaqui Tribe in Guadalupe, Maricopa County, AZ. Phoenix, AZ. SWCA, Inc. Environmental Consultants.
AZ U:9:233(ASM)	AD1900-present Euro-American	Canal	SHPO Determined Eligible	Multiple References

AZ U:9:16(ASM): The proposed undertaking would not be visible from archaeological site AZ U:9:16(ASM). Additionally, a majority of the site has been developed into a residential neighborhood along its western side, a commercial building along its southeastern side, and is intersected by Interstate 10. Therefore, it is our opinion that this resource would not be affected by the proposed undertaking.

AZ U:9:17(ASM): The proposed undertaking would not be visible from archaeological site AZ U:9:17(ASM). Additionally, a majority of the site has been developed into a residential neighborhood along its western side

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

and is intersected by Interstate 10. Therefore, it is our opinion that this resource would not be affected by the proposed undertaking.

AZ U:9:147(ASM): The proposed undertaking would be visible from archaeological site AZ U:9:147(ASM). However, AZ SHPO has determined that the site is ineligible for listing in the NRHP and the southern half of the site has been developed into a residential neighborhood. Therefore, it is our opinion that this resource would not be affected by the proposed undertaking.

AZ U:9:233(ASM): The proposed undertaking would be minimally visible from portions of archaeological site AZ U:9:233(ASM) which has been previously determined by AZ SHPO to be NRHP-eligible. However, a modern overhead utility corridor runs alongside the length of the historic canal. Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the setting of the archaeological site. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

No additional previously recorded sites have been documented within the Visual APE.

13e. Historic Buildings/Districts/Neighborhoods

1. Property Name or Address	2. Year	3. Eligibility Status
Structure 604975	1935	Unevaluated
Structures 605486, 605692, 605740, and 605902	1930, 1946, 1958	Unevaluated
Structure 606012	1946	Unevaluated (Demolished)
ECA MRAA1	1926 through 1974	Unevaluated
ECA MRAA2	1926 through 1976	Unevaluated
ECA MRAA3	1930 through 1976	Unevaluated

According to AZ Site, 212 of the previously identified cultural resources within the potential viewshed of the proposed undertaking are mapped surveyed historic structures that have not been formally determined to be individually eligible for the NRHP or to be contributing resources to a potentially eligible NRHP district. For the purposes of this evaluation, ECA has combined 207 of these unevaluated historic structures into three Multiple Resource Assessment Areas (MRAA) based on provenience.

Structure 604975: Surveyed Structure No. 604975 is currently plotted in AZ Site at 33°21'25.27"N 111°57'30.42"W, which is a modern residential subdivision; however, the address listed in the AZ Site database is 9825 S Calle Vaou Nawi, Guadalupe, AZ. The mapped address plots within ECA's MRAA3 and the resource has been evaluated as a part of MRAA3.

Structures 605486, 605692, 605740, and 605902: Structure numbers 605486, 605692, 605740, and 605902 have been recorded in AZ Site but have not been evaluated for listing in the NHRP. According to the AZ Site database, all four structures are located along E. Calle Circle within the APE for visual effects and include two structures dated 1930 and two from 1946 and 1958, respectively. Based on the coordinates plotted for the resources in the AZ site database, the field investigation, and a review of historic aerial imagery, it appears that site location for these four structures is incorrect and is not located within the APE for visual effects. The buildings to the north of E. Calle Circle were constructed in 1982 and the buildings along E. Calle Circle where the resources were plotted were constructed between 2004-2007. The surrounding area was vacant and undeveloped until the 1980s. A portion of the area to the southeast was developed around 1965 and those resources were located further to the southeast along S. Calle Tomi. As the four resources appear to be misplotted and not within the visual APE, ECA has determined that these resources would not be affected by the proposed undertaking.

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

Structure 606012: Surveyed Structure No. 606012 is recorded in AZ Site at 9638 S Calle Vaou Nawi, Tempe, AZ and was constructed c. 1946. Aerial photographs show that the structure was demolished in 2013 and the current structure at the address was constructed in 2017. ECA verified this information during our in-person cultural resource survey. Therefore, it is our opinion that this resource would not be affected by the proposed undertaking.

Multiple Resource Assessment Area 1: (AZ SITE Structures: 605462, 605541, 605635, 605642, 605866, 605867, 605871, 605872, 605875, 605879, 605880, 605881, 605887, 605888, 605889, 605890, 605891, 605892, 605893, 605894, 605895, 605896, 605897, 605898, 605899, 605901, 605911, 605914, 605916, 605923, 605931, 605940, 605941, 605942, 605943, 605944, 605947, 605948, 605949, 605950, 605951, 605952, 605953, 605954, 605955, 605956, 605957, 605959, 605960, 605961, 605962, 605963, 605964, 605965, 605966, 605967, 605968, 605969, 605970, 605971, 605974, 605975, 605976, 605977, 605978, 605979, 605980, 605981, 605982, 605983, 605984, 605985, 605986, 605987, 605988, 605989, 605990, 605991, 605992, 605993, 605995, 605996, 605997, 605998, 605999, 606000, 606001, 606002, 606003, 606004, 606006, 606007, and 606008) Multiple Resource Assessment Area 1 (MRAA1) is a residential area with a high concentration of buildings of historic age. The area is located to the south of Guadalupe Street and north of Carmen Street and bound on the east by S. Avenida de Yaqui and on the west by Bella Vista Street. The area is located approximately 425 feet (130 meters) west of the proposed undertaking at its closest point. The area contains a collection of historic-age residential structures, however none of structures within MRAA1 have been evaluated for the NRHP by the Arizona SHPO. Structures date from 1926 through 1974, however, based on historic aerial imagery, most of the structures were constructed between 1955 and 1965. The area is largely dominated by wood-framed, brick, and concrete block constructed buildings in the Ranch, Minimal Traditional, and Bungalow typologies. Additionally, none of the buildings within MRAA1 are individually listed in the NHRP.

Based on ECA's viewshed assessment, ECA believes that the proposed undertaking would be visible from MRAA1. ECA assessed four locations within MRAA1 within the visual APE at various distances and determined that the proposed undertaking would be visible from areas closest to the eastern boundary of MRAA1, but views of the proposed undertaking diminish moving further to the west. While the proposed undertaking would be visible, the viewshed from MRAA1 has also been disrupted from the construction of modern infrastructure and utilities. MRAA1 has visibility of modern infrastructure and infill to the south, including a recycling facility and large commercial buildings diminishing the rural and residential setting. Two, guyed-type towers and modern infrastructure such as Interstate 10 are visible to the west. Additionally, views to the east toward the proposed undertaking include existing modern buildings and overhead utilities framing views of the proposed undertaking which also diminish the impact of any potential views of the proposed collocation. While it is unknown if setting would be a qualifying aspect of MRAA1, due to existing modern utilities and infrastructure within the viewshed, the proposed undertaking would not affect any architectural aspects of integrity of the collection of historic-age resources in such a way as to impact any potential NRHP eligibility. It is ECA's opinion that due to distance, modern buildings, overhead utilities, and the disruption to setting from the construction of commercial businesses and existing guyed towers that the proposed undertaking would not be a major vertical intrusion. Therefore, is our opinion that these resources would not be adversely affected by the proposed undertaking.

Multiple Resource Assessment Area 2: (AZ SITE Structures: 605648, 605650, 605651, 605652, 605653, 605655, 605657, 605658, 605660, 605661, 605662, 605663, 605664, 605665, 605666, 605667, 605668, 605669, 605670, 605671, 605672, 605673, 605674, 605675, 605676, 605677, 605678, 605679, 605680, 605681, 605682, 605683, 605684, 605685, 605686, 605690, 605691, 605694, 605696, 605699, 605701, 605703, 605704, 605705, 605706, 605707, 605709, 605711, 605712, 605714, 605716, 605717, 605718, 605719, 605721, 605722, 605724, 605725, 605726, 605798, 605835, 605838, and 605840) Multiple

STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM

Resource Assessment Area 2 (MRAA2) is a residential area with a high concentration of buildings of historic age. The area is located to the north of Guadalupe Street and south of E Calle Iglesia and bound on the east by S. Avenida de Yaqui and on the west by S. Calle Maravilla. The area is located approximately 1,300 feet (396 meters) northwest of the proposed undertaking at its closest point. The area contains a collection of historic-age residential structures, however none of structures within MRAA2 have been evaluated for the NRHP by the Arizona SHPO. Structures date from 1926 through 1976, however, based on historic aerial imagery, most of the structures were constructed between 1960 and 1970. The area is largely dominated by wood-framed, brick, and concrete block constructed buildings in the Ranch, Minimal Traditional, and Bungalow typologies. Additionally, none of the buildings within MRAA2 are individually listed in the NHRP.

Based on ECA's viewshed assessment, ECA believes that the proposed undertaking would be minimally visible from MRAA2. ECA assessed four locations within MRAA2 within the visual APE at various distances and determined that the proposed undertaking would be minimally visible from areas directly adjacent to the eastern boundary of Multiple Resource Area 2 looking south along S. Avenida del Yaqui, but that the undertaking would not be visible at points to the west and throughout most of MRAA2. While the proposed undertaking would be minimally visible, the viewshed from MRAA2 has also been disrupted from the construction of modern infrastructure and utilities. MRAA2 has visibility of two, guyed-type towers and modern infrastructure such as Interstate 10 are visible to the west, diminishing the rural and residential setting. Additionally, views to the south toward the proposed undertaking include existing modern buildings and overhead utilities framing views of the proposed undertaking which also diminish the impact of any potential views of the proposed collocation. While it is unknown if setting is a qualifying aspect of MRAA2, due to existing modern utilities and infrastructure within the viewshed, the proposed undertaking would not affect any architectural aspects of integrity of the collection of historic-age resources in such a way as to impact any potential NRHP eligibility. It is ECA's opinion that due to distance, existing overhead utilities, modern infrastructure, existing guyed towers, and the lower height of the collocation below the existing tree line that the proposed undertaking would not be a major vertical intrusion and would effectively blend into the landscape to such a degree as to not impact the setting of MRAA2. Therefore, is our opinion that these resources would not be adversely affected by the proposed undertaking.

Multiple Resource Assessment Area 3: (AZ SITE Structures: 13038, 604859, 604875, 604876, 604877, 604878, 604879, 604890, 604891, 604892, 604894, 604898, 604900, 604901, 604903, 604905, 604906, 604908, 604909, 604911, 604913, 604915, 604916, 604917, 604919, 604924, 604925, 604926, 604927, 604930, 604931, 604932, 604934, 604935, 604936, 604938, 604939, 604940, 604942, 604943, 604945, 604946, 604948, 604953, 604961, 604963, 604967, 604968, 604969, 604970, 604972, 604973, 604976, 604977, and 605900) Multiple Resource Assessment Area 3 (MRAA3) is a residential area with a high concentration of buildings of historic age. The area is located to the north of Guadalupe Street and south of E Calle Iglesia and bound on the west by S. Avenida de Yaqui and on the west by the North Highland Lateral Canal Trail. The area is located approximately 1,200 feet (366 meters) north of the proposed undertaking at its closest point. The area contains a collection of historic-age residential structures, however none of structures within MRAA3 have been evaluated for the NRHP by the Arizona SHPO. Structures date from 1930 through 1976, however, based on historic aerial imagery, most of the structures along the northern half of the area were constructed between 1960 and 1970 while twenty-first century infill makes up the southern half. The area is largely dominated by wood-framed, brick, and concrete block constructed buildings in the Ranch, Minimal Traditional, and Bungalow typologies. Additionally, none of the buildings within MRAA3 are individually listed in the NHRP.

Based on ECA's viewshed assessment, ECA believes that the proposed collocation would not be visible from MRAA3. ECA assessed four locations from MRAA3 within the visual APE at various distances and the proposed collocation was not visible from any of the locations. Due to the intervening vegetation, distance, existing buildings, and infrastructure including overhead utilities the proposed undertaking would not be

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

visible from the MRAA3. Therefore, is our opinion that these resources would not be affected by the proposed undertaking.

13f. National Register of Historic Places (NRHP) Databases:

1. Property Name or Address	2. Year	3. Eligibility Status
NA	NA	NA

13g. USGS Historic Topographic Maps:

1. Map Name	2. Map Scale	3. Map Date	4. Cultural Features Within the APE
NA	NA	NA	NA

13h. General Land Office (GLO) Survey Plats and Land Patents: Historic (at least 50-year-old) GLO plats on file with the Bureau of Land Management (BLM) that overlap the Class III Study Area were reviewed (BLM 2023). No features intersect the Direct APE on the 1868 GLO depicting Township 1 South, Range 4 East.

13i. Mineral Resource Data System (MRDS): NA

13j. Arizona Department of Water Resources (ADWR) Well Registry: NA

13k. Historic Aerial Imagery: According to historic aerial photographs, the proposed project area was located within an undeveloped desert environment as early as 1953. The surrounding area appears to have become more developed throughout the 1980s, and the west side of the parent parcel was developed into a commercial building between 1997 and 2002. In 2013, the structure to the west of the project area was demolished and the Subject Building was constructed. The project area has remained the same since 2013. No historic resources were identified within the APE for Direct Effects.

14. CULTURAL CONTEXTS

14a. Prehistoric Culture: Archaic, Early Agricultural, Hohokam

14b. Protohistoric Culture: Spanish, AD 1452 to 1700s

14c. Indigenous Historic Culture: Yaqui; O’odham

14d. Euro-American Culture: AD 1700s to 1950s

15. FIELD SURVEY PERSONNEL

15a. Principal Investigator: Shannon Lowman

15b. Field Supervisor: Shannon Lowman

15c. Crew: NA

15d. Fieldwork Date(s): May 15, 2023 (No Class III Survey Performed- only conducted a visual assessment from historic resources)

STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM

16. SURVEY METHODS

16a. Transect Intervals: NA

16b. Coverage (%): NA

16c. Site Recording Criteria: NA

16d. Ground Surface Visibility: NA

16e. Observed Disturbances: NA

17. FIELD SURVEY RESULTS

17a. No Cultural Resources Identified:

17b. Historical In-Use Structures Identified: ; **Form(s) Attached:**

17c. Number of IOs Recorded: 0

17d. Table of IOs.

1. IO Number	2. Description	3. Date Range	4. UTM's

STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM

18. VISUAL APE

18a. National Register Eligible Sites within 1/2-Mile Visual APE: 1

18b. National Register of Unevaluated Sites within 1/2-Mile Visual APE: 216

19. COMMENTS:

ECA has assessed the effects of the telecommunications facility on known historic properties.

Direct APE: No historic properties are located within the Direct APE. Accordingly, a finding of “No Historic Properties Affected” is recommended.

Visual APE: Two hundred and sixteen previously recorded cultural resources are present within the 1/2-mile visual APE. One of these cultural resources has been previously determined NRHP-eligible by AZ SHPO, one cultural resource has been previously determined ineligible, and the remaining resources are unevaluated. ECA is of the opinion that the proposed undertaking would not diminish the setting of any of the cultural resources. Accordingly, a finding of “No Adverse Effect” is recommended.

SECTION 20. ATTACHMENTS

20a. Project Location Map:

20b. Direct APE Map:

20c. Site Vicinity Plan:

20d. Historic Aerials:

20e. GLO Map(s):

20f. References:

SECTION 20. CONSULTANT CERTIFICATION

I certify the information provided herein has been reviewed for content and accuracy and all work meets applicable agency standards.



Signature

Principal Archaeologist

Title



Signature

Principal Investigator

Title

Date: July 28, 2023

SECTION 21. DISCOVERY CLAUSE

In the event that previously unreported cultural resources are encountered during ground disturbing activities, all work must immediately cease within 30 meters (100 feet) until a qualified archaeologist has documented the discovery and evaluated its eligibility for the Arizona or National Register of Historic Places in consultation with the lead agency, the SHPO, and Tribes, as appropriate. Work must not resume in this area without approval of the lead agency.

If human remains are encountered during ground-disturbing activities, all work must immediately cease within 30 meters (100 feet) of the discovery and the area must be secured. The Arizona State Museum, lead agency, SHPO, and appropriate Tribes must be notified of the discovery. All discoveries will be treated in accordance with NAGPRA (Public Law 101-601; 25 U.S.C. 3001-3013) or Arizona Revised Statutes (A.R.S. § 41-844 and A.R.S. § 41-865), as appropriate, and work must not resume in this area without authorization from ASM and the lead agency.

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Marana Tower Site

Grant Applicant: Pascua Yaqui Tribe	Consulting Firm: Environmental Corporation of America
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004	Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057
Contact Email Address: shannon.lowman@eca-usa.com	Contact Phone: 404-345-2301
Project Description: (e.g., full description; extent of any ground disturbing activities) Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to construct a 75-foot tall (overall height) monopole telecommunications structure and associated ground equipment within a proposed approximate 25-foot by 55-foot (8-meter by 17-meter) fenced tower compound. The project would also include a proposed approximate 85-foot long (26-meter) buried fiber route.	
Describe Area of Potential Effects (APE): (include acreage, dimensions, utility corridors, access roads, staging areas) The APE would include a proposed 25-foot by 55-foot (8-meter by 17-meter) fenced tower compound and a proposed 85-foot long (26-meter) buried fiber route, which would total approximately 0.03 acres (0.01 hectares).	
Land Jurisdiction(s): The proposed project would be on fee land that is owned by the Pascua Yaqui Tribe.	Legal Description (Township, Range, & Section): Township 11S, Range 11E, SW ¼ of the NW ¼ of Section 27
USGS Quad(s): Marana, AZ (1996)	UTM Coordinates: 479749 m E 3589974 m N
Project Type: <input type="checkbox"/> New broadband installation (with ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (no ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (with ground disturbance) <input checked="" type="checkbox"/> New telecommunication facility/tower <input type="checkbox"/> Other:	Type of Investigation Conducted <input type="checkbox"/> Class I Inventory <input checked="" type="checkbox"/> Class III Survey <input type="checkbox"/> No Survey (no ground disturbance only)
Tribes Contacted for this Undertaking: (provide list; note any tribal concerns) ECA will be adhering to the NTIA's tribal consultation requirements and utilizing TCNS and the AZ G2G Toolkit to initiate tribal consultation.	
Cultural Resources: Cultural Resources Present? (Any prehistoric or historic [50+ years old] archaeological sites or historic structures regardless of NRHP-eligibility) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No Historic Properties Present? (Any prehistoric or historic site, district, building, structure, or object listed in, eligible for listing in the NRHP or whose NRHP eligibility is unevaluated) <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
List of Cultural Resources: (add rows as necessary or attach report)	

Grant Applicant: Pascua Yaqui Tribe		Consulting Firm: Environmental Corporation of America	
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004		Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057	
Site Number/ Address	Affiliation/ Construction Date	Site Type	NRHP Eligibility Status
See attached SRSF	For Cultural	Resources outside of	Direct APE
Name of Historic District or Neighborhood Project in which the APE is Located or Immediately Adjacent to (if applicable): Within <input type="checkbox"/> Adjacent <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> (check one)			
Responsible Party Signature and Date: 7/28/2023 			
SHPO Response			
Finding of Effect <input type="checkbox"/> No Historic Properties Affected <input checked="" type="checkbox"/> No Adverse Effect <input type="checkbox"/> Adverse Effect			
<p>We remind the applicant and NTIA that the views of Indian tribes are based on expertise and information not available and/or possessed by our staff, but are critical to informing the Section 106 review process. The applicant/NTIA remains responsible for consulting with and considering the views of Indian tribes. We request that applicant/NTIA provide our office with a summary of any views conveyed by Indian tribes that are not in agreement with SHPO's response, and in so doing SHPO reserves the right to exercise our responsibility to respond to new information and modify our findings, as necessary.</p> <p>Please inform SHPO of any tribal concerns; if you have no response from Tribes, please follow up with a phone call or email; do not assume there is no response.</p> <p>Additional SHPO comments:</p>			
SHPO Signature and Date: 			8/25/2023

*Submit this form and supporting documents to azshpo@azstateparks.gov.

**For additional information regarding NTIA projects, please see the NTIA-SHPO Section 106 guidance on our website under azstateparks.com/shpo-forms-and-publications.

Attachment A

Class III Cultural Resources Survey Report Summary Form

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

1

1. REPORT TITLE

1a. Report Title: A Class III Cultural Resources Survey of a Proposed 75-Foot Overall Height Monopole Telecommunications Structure, Marana, Pima County, Arizona

1b. Report Author(s): Shannon Lowman, MA, RPA and Matthew Beazley, MA, RPA

1c. Date: July 28, 2023 **1d. Report No.:** 23-001200

2. PROJECT REGISTRATION/PERMITS

2a. ASM Accession Number: NA

2b. AAA Permit Number: NA

2c. ASLD Lease Application Number(s): NA

2d. Other Permit Number(s): NA

3. ORGANIZATION/CONSULTING FIRM

3a. Name: Environmental Corporation of America

3b. Internal Project Number: 23-001200

3c. Internal Project Name: Marana Tower Site

3d. Contact Name: Shannon Lowman

3e. Contact Address: 1375 Union Hill Industrial Court, Alpharetta, GA 30004

3f. Contact Phone: 770-667-2040 (office); 404-345-2301 (cell-preferred)

3g. Contact Email: shannon.lowman@eca-usa.com

4. SPONSOR/LEAD AGENCY

4a. Sponsor: National Telecommunications and Information Administration

4b. Lead Agency: National Telecommunications and Information Administration

4c. Agency Project Number(s): NA

4d. Agency Project Name: NA

4e. Funding Source(s): Federal Broadband Grant (National Telecommunications and Information Administration)

4f. Other Involved Agencies: AZ SHPO, Federal Communications Commission

4g. Applicable Regulations: Section 106 of the National Historic Preservation Act

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

5. DESCRIPTION OF PROJECT OR UNDERTAKING: Environmental Corporation of America’s (ECA) client, Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to construct a 75-foot tall (overall height) monopole telecommunications structure located at 11720-11738 W Camino Pinos, Marana, Pima County, Arizona. The proposed undertaking would occur on a fee simple parcel that is owned by the Pascua Yaqui Tribe. ECA understands that the proposed project is grant-funded and administered through the National Telecommunications and Information Administration (NTIA). ECA understands that Native Network, Inc (on behalf of the Pascua Yaqui Tribe) plans to construct a 75-foot tall overall height monopole telecommunications structure within a proposed approximate 25-foot by 55-foot (8-meter by 17-meter) tower compound. The project would also include a proposed approximate 85-foot long (26-meter) buried fiber route. The total Direct APE is approximately 1,460 square feet (0.03 acres).

6. PROJECT AREA/AREA OF POTENTIAL EFFECTS: The APE for Direct Effects (Direct APE) is defined as that area that would be directly impacted by the construction and operating activities associated with the proposed undertaking. The total Direct APE is approximately 1,460 square feet (0.03 acres). The APE for Visual Effects (Visual APE) is the geographic area or areas within which the facility may directly or indirectly cause alterations in the character or use of historic properties. ECA has defined the visual APE as a half mile radius surrounding the proposed tower structure. The new telecommunications structure will have an overall height of 75 feet.

7. PROJECT LOCATION

7a. Address: 11720-11738 W Camino Pinos, Marana, Pima County, Arizona

7b. Route: NA **7c. Mileposts Limits:** NA

7d. Nearest City/Town: Marana **7e. County:** Pima

7f. Project Locator UTM: 479749 Easting 3589974 Northing **7g. NAD 83** **7h. Zone:** 12N

7i. Baseline & Meridian: G&SRB&M **7j. USGS Quadrangle(s):** Marana, AZ

7k. Legal Description(s): SW ¼ of NW ¼ of Section 27, Township 11 South, Range 11 East

7l. Land Ownership: Fee Simple- Owned by the Pascua Yaqui Tribe

8. SURVEY AREA

8a. Total Acres: 0.03

8b. Survey Area.

1. Land Jurisdiction	2. Total Acres Surveyed	3. Total Acres Not Surveyed	4. Justification for Areas Not Surveyed
Fee Simple- Pascua Yaqui Tribe	0.03 acres	0	NA

9. ENVIRONMENTAL CONTEXTS

9a. Landform: Valley of the Santa Cruz River

9b. Elevation: 1,992 feet above mean sea level

9c. Surrounding Topographic Features: The nearest topographic feature is the Santa Cruz River located approximately 1 mile (1.6 km) southwest of the Direct APE.

9d. Nearest Drainage: Santa Cruz River approximately 1 mile (1.6 km) southwest of the Direct APE.

9e. Local Geology: The project area is located within the Basin and Range Physiographic Province of Arizona. With elongate mountain ranges and flat dry deserts, the Basin and Range region stretches from eastern California to central Utah and from southern Idaho into Mexico.

9f. Vegetation: The survey area is located within a residentially developed area. Vegetation is sparse within the Direct APE and includes minimal grasses and one palm tree.

9g. Soils/Deposition: Soils located within the proposed project area include Gila loam (NRCS). Gila loam consists of very deep, well drained soils formed in stratified alluvium.

9h. Buried Deposits: Not likely

9i. Justification: No surface indications of potential buried deposits were observed within the Direct APE.

10. BUILT ENVIRONMENT: The Direct APE is located on the eastern edge of a residential community. It is located within a dirt and graveled area bordered by a residence to the north, W Camino Pinos to the west and undeveloped land to the east.

11. INVENTORY CLASS COMPLETED

11a. Class I Inventory:

11b. Researcher(s): Shannon Lowman

11c. Class II Survey:

11d Sampling Strategy: NA

11e. Class III Inventory:

12. BACKGROUND RESEARCH SOURCES

12a. AZSITE:

12b. ASM Archaeological Records Office:

12c. SHPO Inventories and/or SHPO Library:

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

12d. NRHP Database:

12e. ADOT Portal:

12f. GLO Maps:

12g. USGS Historic Maps:

12h. Land - Managing Agency Files: NA

12i. Tribal Cultural Resources Files: NA

12j. Local Government Websites: NA

12k. ADWR Well Registry:

12l. Mine Data:

12m. Other: Historic aerial imagery

13. BACKGROUND RESEARCH RESULTS

13a. Previous Projects Within Direct APE.

1. Project Reference Number	2. Project Name	3. Author(s)	4. Year
2004-1726.ASM	Marana Town Center Survey	James W. Cogswell	2004

Records indicate that 21 survey projects have been previously completed within the 1/2-mile background research radius. The remaining 20 survey projects are located outside the Direct APE.

13b. AZSITE-recorded Cultural Resources within the Direct APE.

1. Site Number/Name	2. Affiliation	3. Site Type	4. Eligibility Status	5. Associated Reference(s)
NA	NA	NA	NA	NA

No previously identified cultural resources were located within the Direct APE.

13c. Previous Projects Within the Visual APE.

1. Project Reference Number	2. Project Name	3. Author(s)	4. Year
12-19-8.BLM	Unknown	Unknown	Unknown
1982-108.ASM	Marana Canning Co., Inc.	S. Urban	1982
1983-198.ASM	Northern Tucson Basin Survey / Marana Phase II	P. Fish	1983
1995-435.ASM	Marana Survey	M. Heuett	1995
1999-389.ASM	Lon Adams Road Dental Office	David Stephen	1999

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

1. Project Reference Number	2. Project Name	3. Author(s)	4. Year
2000-16.ASM	Marana/Honea Heights Colonia WWM Sewerline-Cultural Resources Assessment	Jeffrey T. Jones	2000
2003-1070.ASM	EPNG Tucson Class III Survey	Jerome S. Hesse and Anastacia E. Gutierrez	2003
2003-1254.ASM	Marana Gardens II	James Moses	2003
2004-1726.ASM	Marana Town Center Survey	James W. Cogswell	2004
2004-545.ASM	Marana Fire Station Survey	Allison Cohen Diehl	2004
2004-620.ASM	Marana Town Hall Monopole Cultural Resources Survey	Jeffrey T. Jones	2004
2004-9.ASM	Marana Gardens	David P. Doak	2004
2006-433.ASM	EPNG Lines 1007 and 1008 Long Range Remediation	Jerome S. Hesse	2006
2007-85.ASM	Marana Place	David A. Bild	2007
2009-461.ASM	Barnett Channel Survey	Annick Lascaux and Joseph Howell	2009
2010-133.ASM	Marana Health Center	John T. Marshall, Eric S. Cox, and Douglas B. Craig	2010
2010-532.ASM	Barnett Road Building Documentation	Allison Cohen Diehl	2010
2013-466.ASM	Sandario Road Sidewalk	John M. D. Hooper	2013
2014-470.ASM	Town Of Marana Proposed Sewer Alignment	Anna Martin King	2014
2016-201.ASM	Town of Marana Municipal Complex Survey	David M.R. Barr and Suzanne Griset	2016
2019-422.ASM	Lon Adams Reconstruction	Lesley Rodriguez	2019

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

13d. AZSITE-recorded Cultural Resources within the Visual APE.

1. Site Number/Name	2. Affiliation	3. Site Type	4. Eligibility Status	5. Associated Reference(s)
AZ AA:12:680(ASM)	AD200-1500 Hohokam	Ceramic scatter	Not Evaluated	N/A
AZ AA:12:923(ASM)	AD200-1500 Hohokam	Ceramic scatter	Recorder Recommended Eligible; SHPO Has Not Evaluated	42917.ASM; 9376; Doak (2003), A class III cultural resource survey of a 9.85-acre parcel in Marana, Pima County, Arizona: The Marana Gardens Survey. Tierra Archaeological Report 2002-4. Tierra Right-of-Way Services, Ltd. Tucson, AZ.
AZ AA:12:1068(ASM)	Historic AD1500-1950 Euro-American	Two habitations and one carport	Recorder Recommended Eligible; SHPO Has Not Evaluated	57767.ASM; 17544; Lascaux, Annick and Joseph Howell, 2009, A Class III Cultural Resource Survey of the Barnett Linear Park and Flood Control Channel, Marana, Pima County, AZ. Tierra Archaeological Report No. 2009-26. Tierra Right-of-Way Services, Ltd. Tucson, AZ.
AZ AA:12:1078(ASM)	Historic AD1500-1950 Euro-American	Concrete pad	Recorder Recommended Eligible; SHPO Has Not Evaluated	57767.ASM; 17544; Lascaux, Annick and Joseph Howell, 2009, A Class III Cultural Resource Survey of the Barnett Linear Park and Flood Control Channel, Marana, Pima County, AZ. Tierra Archaeological Report No. 2009-26. Tierra Right-of-Way Services, Ltd. Tucson, AZ.

AZ AA:12:680(ASM): The proposed tower would not be visible from archaeological site AZ AA:12:680(ASM), and the entirety of the archaeological site has been developed into a residential neighborhood. Therefore, it is our opinion that this resource would not be affected by the proposed undertaking.

AZ AA:12:923(ASM): The proposed tower would be visible from archaeological site AZ AA:12:923(ASM). However, the area directly north of the site has undergone modern commercial and residential development, and there are modern overhead utility corridors to the north, east, and south of the site. Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting of the resource. Therefore, it is ECA's opinion that this resource would not be adversely affected by the proposed undertaking.

**STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM**

AZ AA:12:1068(ASM) and AZ AA:12:1078(ASM): The proposed tower would be visible from archaeological sites AZ AA:12:1068(ASM) and AZ AA:12:1078(ASM). However, during ECA’s visual impacts survey, both sites appear to have been heavily disturbed by construction activities after the site forms were authored. There are currently no standing structures remaining at site AZ AA:12:1068(ASM). Furthermore, there is a modern overhead utility corridor to the north of both sites, and a currently existing telecommunications structure to the northeast of both sites. Given the current state of each site and the existing modern intrusions, it is ECA’s opinion that the proposed undertaking would not diminish the existing setting of either resource. Therefore, it is ECA’s opinion that these resources would not be adversely affected by the proposed undertaking.

No additional previously recorded sites have been documented within the Visual APE.

13e. Historic Buildings/Districts/Neighborhoods

1. Property Name or Address	2. Year	3. Eligibility Status
NA	NA	NA

13f. National Register of Historic Places (NRHP) Databases:

1. Property Name or Address	2. Year	3. Eligibility Status
NA	NA	NA

13g. USGS Historic Topographic Maps:

1. Map Name	2. Map Scale	3. Map Date	4. Cultural Features Within the APE
NA	NA	NA	NA

13h. General Land Office (GLO) Survey Plats and Land Patents: Historic (at least 50-year-old) GLO plats on file with the Bureau of Land Management (BLM) that overlap the Class III Study Area were reviewed (BLM 2023). No features intersect the Direct APE on the 1896 GLO depicting Township 11 South, Range 11 East.

13i. Mineral Resource Data System (MRDS): NA

13j. Arizona Department of Water Resources (ADWR) Well Registry: NA

13k. Historic Aerial Imagery: According to aerial photographs, the APE for direct effects has been located on the eastern edge of a residential community since at least 1956. Between 1956 and present, the surrounding area has continued to grow as more residential buildings have been constructed to the northwest, and land was graded directly east of the proposed project area. Today, the APE for direct effects is located within a dirt and graveled area adjacent to W Camino Pinos, just south of a residential parcel. No historic resources were identified within the APE for Direct Effects.

14. CULTURAL CONTEXTS

14a. Prehistoric Culture: Archaic, Early Agricultural, Hohokam

14b. Protohistoric Culture: Spanish, AD 1452 to 1700s

14c. Indigenous Historic Culture: Yaqui; O’odham

14d. Euro-American Culture: AD 1700s to 1950s

STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM

15. FIELD SURVEY PERSONNEL

15a. Principal Investigator: Shannon Lowman

15b. Field Supervisor: Shannon Lowman

15c. Crew: NA

15d. Fieldwork Date(s): May 16, 2023

16. SURVEY METHODS

16a. Transect Intervals: 15-foot (5-meter)

16b. Coverage (%): 100

16c. Site Recording Criteria: Arizona State Museum

16d. Ground Surface Visibility: 0-100%

16e. Observed Disturbances: Historic aerial imagery indicates that vegetation within the APE for direct effects has been cleared on multiple occasions, notably at some point in 2007 and again between 2015 and 2017.

17. FIELD SURVEY RESULTS

17a. No Cultural Resources Identified:

17b. Historical In-Use Structures Identified: ; **Form(s) Attached:**

17c. Number of IOs Recorded: 0

17d. Table of IOs.

1. IO Number	2. Description	3. Date Range	4. UTM's

STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM

18. VISUAL APE

18a. National Register Eligible Sites within 1/2-Mile Visual APE: 0

18b. National Register of Unevaluated Sites within 1/2-Mile Visual APE: 4

19. COMMENTS:

ECA has assessed the effects of the telecommunications facility on known historic properties.

Direct APE: No historic properties are located within the Direct APE. Accordingly, a finding of "No Historic Properties Affected" is recommended.

Visual APE: Four previously recorded cultural resources are present within the visual APE. None of the cultural resources have formally been determined eligible for listing in the NRHP, and ECA is of the opinion that the proposed tower would not diminish the setting of any of the cultural resources. Accordingly, a finding of "No Adverse Effect" is recommended.

During the course of this Class III Cultural Resources Survey, no historic properties were located in the APE for direct effects. Further, although there are historic resources within the viewshed of the proposed undertaking, it is ECA's opinion that those resources would not be adversely affected. Therefore, we recommend a finding of "No Adverse Effect" for the proposed undertaking and request your concurrence with our finding.

SECTION 20. ATTACHMENTS

20a. Project Location Map:

20b. Direct APE Map:

20c. Site Vicinity Plan:

20d. Historic Aerials:

20e. GLO Map(s):

20f. References:

SECTION 20. CONSULTANT CERTIFICATION

I certify the information provided herein has been reviewed for content and accuracy and all work meets applicable agency standards.



Signature

Principal Archaeologist

Title



Signature

Principal Investigator

Title

Date: July 28, 2023

SECTION 21. DISCOVERY CLAUSE

In the event that previously unreported cultural resources are encountered during ground disturbing activities, all work must immediately cease within 30 meters (100 feet) until a qualified archaeologist has documented the discovery and evaluated its eligibility for the Arizona or National Register of Historic Places in consultation with the lead agency, the SHPO, and Tribes, as appropriate. Work must not resume in this area without approval of the lead agency.

If human remains are encountered during ground-disturbing activities, all work must immediately cease within 30 meters (100 feet) of the discovery and the area must be secured. The Arizona State Museum, lead agency, SHPO, and appropriate Tribes must be notified of the discovery. All discoveries will be treated in accordance with NAGPRA (Public Law 101-601; 25 U.S.C. 3001-3013) or Arizona Revised Statutes (A.R.S. § 41-844 and A.R.S. § 41-865), as appropriate, and work must not resume in this area without authorization from ASM and the lead agency.

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Milagros Tower Site



SHPO-2023-1003 (171988)

Rec: 10/23/2023

ENVIRONMENTAL CORPORATION OF AMERICA

ENVIRONMENTAL | GEOTECHNICAL | WETLANDS | REGULATORY | CULTURAL RESOURCES

October 23, 2023

Arizona State Historic Preservation Office
Arizona State Parks and Trails
1110 W Washington Street Ste 100
Phoenix, AZ 85007-2957

Attention: Caroline Klebacha
Archaeological Compliance Specialist

Subject: Section 106 Review – Scope Change Notification Letter
TCNS ID # 269915
Proposed 75-Foot Tall Monopole Telecommunications Structure
(Overall Height with Appurtenances)
Milagros
899 W 44th Street
Tucson, Pima County, Arizona
ECA Project # 23-001190

Dear Ms. Klebacha,

On July 28, 2023, Environmental Corporation of America (ECA) submitted Section 106 Review documentation for Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) regarding a proposed 75-foot tall overall height monopole telecommunications structure to be located on land that is owned by the Pascua Yaqui Tribe. The Arizona State Historic Preservation Office (AZ SHPO) responded on August 25, 2023, to request additional information regarding previous data recovery within the proposed APE for direct effects as the proposed project would be located within the boundary of the National Register-eligible Julian Wash Archaeological Site [AZ BB:13:17 (ASM)]. ECA emailed AZ SHPO the requested information on September 6, 2023. On October 16, 2023, Dr. Karl Hoerig, Tribal Historic Preservation Officer for the Pascua Yaqui Tribe notified ECA that the Arizona State Historic Preservation Office reviewed the additional information and has requested deep archaeological testing be conducted within the footprint of the proposed 100-foot (30-meter) long buried fiber route that would extend through the City of Tucson public right-of-way.

ECA shared the request with Native Network, Inc., and upon further discussion, Native Network, Inc. has committed to alter the proposed fiber route construction plan to eliminate any ground disturbance outside of the currently proposed tower compound. The previously proposed plan for a 100-foot (30-meter) long buried fiber route will now be replaced with a newly proposed aerial fiber route that would extend above ground from within the proposed 40-foot by 40-foot (12-meter

by 12-meter) tower compound to the existing utility pole located within the City of Tucson public right-of-way. No other changes to the project have been proposed.

ECA is of the opinion that the newly proposed aerial fiber route will alleviate any potential adverse effects to the Julian Wash Archaeological Site [AZ BB:13:17 (ASM)] outside of the proposed tower compound. Additionally, the Pascua Yaqui THPO office has stated that they will provide archaeological monitoring during all ground disturbance located within the proposed tower compound.

Based on this documentation, ECA recommends a finding of “No Adverse Effect” for the proposed undertaking. We request your concurrence with our finding. Please contact our office with questions or comments or if additional information is required.

Sincerely,
Environmental Corporation of America



Shannon Lowman, MA, RPA
Principal Archaeologist


Concur, no adverse effect.



Caroline Klebacha, M.A.
State Historic Preservation Office
October 23, 2023

NTIA - ARIZONA SHPO
Section 106 Consultation Form
Effective June 2023

Grant Applicant: Pascua Yaqui Tribe	Consulting Firm: Environmental Corporation of America
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004	Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057
Contact Email Address: shannon.lowman@eca-usa.com	Contact Phone: 404-345-2301
Project Description: <i>(e.g., full description; extent of any ground disturbing activities)</i> Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to construct a 75-foot tall (overall height) monopole telecommunications structure and associated ground equipment within a proposed approximate 40-foot by 40-foot (12-meter by 12-meter) fenced tower compound. The project would also include a proposed approximate 100-foot long (30-meter) buried fiber route.	
Describe Area of Potential Effects (APE): <i>(include acreage, dimensions, utility corridors, access roads, staging areas)</i> The APE would include a proposed 40-foot by 40-foot (12-meter by 12-meter) fenced tower compound and a proposed 100-foot long (30-meter) buried fiber route, which would total approximately 0.04 acres (0.02 hectares).	
Land Jurisdiction(s): The proposed project would be on fee land that is owned by the Pascua Yaqui Tribe.	Legal Description (Township, Range, & Section): Township 14S, Range 13E, NW ¼ of the SE ¼ of Section 26
USGS Quad(s): Tucson, AZ (1996)	UTM Coordinates: 501531 m E 3560930 m N
Project Type: <input type="checkbox"/> New broadband installation (with ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (no ground disturbance) <input type="checkbox"/> Hardware on existing infrastructure (with ground disturbance) <input checked="" type="checkbox"/> New telecommunication facility/tower <input type="checkbox"/> Other:	Type of Investigation Conducted <input type="checkbox"/> Class I Inventory <input checked="" type="checkbox"/> Class III Survey <input type="checkbox"/> No Survey (no ground disturbance only)
Tribes Contacted for this Undertaking: <i>(provide list; note any tribal concerns)</i> ECA will be adhering to the NTIA's tribal consultation requirements and utilizing TCNS and the AZ G2G Toolkit to initiate tribal consultation.	
Cultural Resources: Cultural Resources Present? (Any prehistoric or historic [50+ years old] archaeological sites or historic structures regardless of NRHP-eligibility) <input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No Historic Properties Present? (Any prehistoric or historic site, district, building, structure, or object listed in, eligible for listing in the NRHP or whose NRHP eligibility is unevaluated) <input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No	
List of Cultural Resources: <i>(add rows as necessary or attach report)</i>	

Grant Applicant: Pascua Yaqui Tribe		Consulting Firm: Environmental Corporation of America	
Contact Name & Address: Shannon Lowman 1375 Union Hill Industrial Court Alpharetta, GA 30004		Grant Program: National Telecommunications and Information Administration Broadband Grant Grant #: NT22TBC0290057	
Site Number/ Address	Affiliation/ Construction Date	Site Type	NRHP Eligibility Status
See attached Report			
Name of Historic District or Neighborhood Project in which the APE is Located or Immediately Adjacent to (if applicable): AZ BB:13:17 (ASM)- Julian Wash Site Within <input checked="" type="checkbox"/> Adjacent <input type="checkbox"/> Not Applicable <input type="checkbox"/> (check one)			
Responsible Party Signature and Date: 7/28/2023 			
SHPO Response			
Finding of Effect <input type="checkbox"/> No Historic Properties Affected <input type="checkbox"/> No Adverse Effect <input type="checkbox"/> Adverse Effect			
<p>We remind the applicant and NTIA that the views of Indian tribes are based on expertise and information not available and/or possessed by our staff, but are critical to informing the Section 106 review process. The applicant/NTIA remains responsible for consulting with and considering the views of Indian tribes. We request that applicant/NTIA provide our office with a summary of any views conveyed by Indian tribes that are not in agreement with SHPO's response, and in so doing SHPO reserves the right to exercise our responsibility to respond to new information and modify our findings, as necessary.</p> <p>Please inform SHPO of any tribal concerns; if you have no response from Tribes, please follow up with a phone call or email; do not assume there is no response.</p> <p>Additional SHPO comments:</p>			
SHPO Signature and Date:			

*Submit this form and supporting documents to azshpo@azstateparks.gov.

**For additional information regarding NTIA projects, please see the NTIA-SHPO Section 106 guidance on our website under azstateparks.com/shpo-forms-and-publications.

Class III Cultural Resources Survey
Proposed 75-Foot Overall Height
Monopole Telecommunications Structure
899 W 44th Street
Tucson, Pima County, Arizona



ECA Project#: 23-001190

TCNS ID #: Pending

Report Date: July 28, 2023

Submitted to:

Kathryn Leonard
Arizona State Historic Preservation Office
Arizona State Parks and Trails
1110 W Washington Street Ste 100
Phoenix, AZ 85007-2957

Lead Federal Agency:

National Telecommunications and Information Administration

Submitted By:

Matthew Beazley, MA, RPA
Principal Archaeologist



Shannon Lowman, MA, RPA
Principal Investigator

ABSTRACT

Environmental Corporation of America's client, Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to construct a 75-foot tall (overall height) monopole telecommunications structure located at 899 W 44th Street, Tucson, Pima County, Arizona. The proposed undertaking would occur on land that is owned by the Pascua Yaqui Tribe. ECA understands that the proposed project is grant-funded and administered through the National Telecommunications and Information Administration (NTIA). ECA conducted a Class III Cultural Resources Survey of the Area of Potential Effects (APE) consisting of background research, intensive field survey, and preparation of this report.

ECA reviewed cultural records and databases and identified one archaeological site (AZ BB:13:17 ASM) mapped within the APE for direct effects. Site AZ BB:13:17 (ASM) is a large Hohokam village site. Components of this site have been surveyed and tested on several occasions since the 1950s and large portions of the site have been disturbed by residential development and the construction of Interstate 19. In addition, three previously conducted archaeological surveys (1985-184.ASM, 2007-332.ASM, and 2018-471.ASM) also encompass the APE for direct effects. However, none of these surveys identified any other cultural resources within the APE for direct effects. During the course of the field survey portion of this Class III Cultural Resources Survey, no archaeological cultural resources were encountered. Further, although cultural resources are present within the viewshed of the proposed undertaking, it is ECA's opinion that those resources would not be adversely affected.

Therefore, ECA believes that the proposed undertaking would have no adverse effect on any historic properties that are listed in or eligible for listing in the National Register of Historic Places. Based on our findings, we recommend a finding of "No Adverse Effect" and no further consultation under Section 106 Review of the National Historic Preservation Act for this proposed undertaking.

TABLE OF CONTENTS

ABSTRACT.....	1
TABLE OF CONTENTS.....	2
LIST OF FIGURES	3
LIST OF PHOTOGRAPHS.....	3
INTRODUCTION	5
AREAS OF POTENTIAL EFFECTS (APEs).....	5
ENVIRONMENTAL SETTING	6
CULTURAL HISTORY.....	7
LAND USE HISTORY.....	11
CLASS I PREVIOUS RECORDS REVIEW	11
ASSESSMENT OF VISUAL EFFECTS.....	15
ASSESSMENT OF DIRECT EFFECTS.....	19
FIELD CONDITIONS.....	19
FIELD METHODS.....	19
SUMMARY	21
RECOMMENDATIONS.....	21
CLOSURE	22
REFERENCES CITED.....	23

Appendix A: Figures

Appendix B: Photographs

**Resumes of key personnel involved with the project can be provided upon request.*

LIST OF FIGURES

Figure 1: APE for Visual Effects

Figure 2: APE for Direct Effects

Figure 3: Site Vicinity Plan

Figure 4: 2020 Aerial Photograph

Figure 5: 2009 Aerial Photograph

Figure 6: 2002 Aerial Photograph

Figure 7: 1992 Aerial Photograph

Figure 8: 1966 Aerial Photograph

Figure 9: 1956 Aerial Photograph

Figure 10: 1871 GLO map

LIST OF PHOTOGRAPHS

Photograph A: Northerly View from the Center of the Proposed Tower Compound

Photograph B: Easterly View from the Center of the Proposed Tower Compound

Photograph C: Southerly View from the Center of the Proposed Tower Compound

Photograph D: Westerly View from the Center of the Proposed Tower Compound

Photograph E: Southeasterly View of the Proposed Tower Compound

Photograph F: Northwesterly View of the Proposed Tower Compound

Photograph G: Northeasterly View of the Proposed Fiber Route

Photograph H: Southwesterly View of the Proposed Fiber Route

Photograph 1A: Overview of AZ BB:13:97 (ASM)

Photograph 1B: Northwesterly View from AZ BB: 13:97 (ASM)

Photograph 2A: Overview of AZ BB:13:96 (ASM)

Photograph 2B: Northeasterly View from AZ BB:13:96 (ASM)

Photograph 3A: Overview of AZ BB:13:539 (ASM)

Photograph 3B: Easterly View from AZ BB:13:539 (ASM)

Photograph 4A: Overview of AZ BB:13:95 (ASM)

Photograph 4B: Southeasterly View from AZ BB:13:95 (ASM)

Photograph 5A: Southwesterly View from AZ BB:13:17 (ASM)

Photograph 5B: Southwesterly View from AZ BB:13:17 (ASM)

Photograph 5C: Southeasterly View from AZ BB:13:17 (ASM)

Photograph 5D: Northwesterly View from AZ BB:13:17 (ASM)

Photograph 5E: Southwesterly View from AZ BB:13:17 (ASM)

Photograph 5F: Southwesterly View from AZ BB:13:17 (ASM)

Photograph 5G: Southwesterly View from AZ BB:13:17 (ASM)

Photograph 6A: Overview of AZ BB:13:832 (ASM)

Photograph 6B: Southeasterly View from AZ BB:13:832 (ASM)

Photograph 6C: Northeasterly View from AZ BB:13:832 (ASM)

Photograph 7A: Overview of AZ BB:13:833 (ASM)

Photograph 7B: Southeasterly View from AZ BB:13:833 (ASM)

Photograph 7C: Northeasterly View from AZ BB:13:833 (ASM)

Photograph 8A: View of Structure 38083

Photograph 8B: Southwesterly View from Structure 38083

INTRODUCTION

Environmental Corporation of America was contracted by Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) to perform a Class III Cultural Resources Survey as part of the Section 106 Review process for a proposed telecommunications facility. The proposed facility would be located at 899 W 44th Street, Tucson, Pima County, Arizona. Although the parent tract of land is owned by the Pascua Yaqui Tribe, it is not on reservation/trust land. Therefore, it is ECA's understanding that consultation with SHPO is required. ECA understands that the proposed project is grant-funded and administered through the National Telecommunications and Information Administration (NTIA). The purpose of our work was to determine whether any historic properties might exist within the proposed project APEs for visual and direct effects.

AREAS OF POTENTIAL EFFECTS (APEs)

Area of Potential Effects for Visual Effects

The APE for visual effects is the geographic area or areas within which the facility may directly or indirectly cause alterations in the character or use of historic properties. Based on the proposed height of the tower structure, ECA has defined the visual APE as a ½ -mile radius.

Area of Potential Effects for Direct Effects

The APE for direct effects is the area that will be physically impacted by construction of the proposed undertaking. For this project, the APE for direct effects is limited to the proposed tower site and associated tower compound and fiber route. For this undertaking, the area of disturbance would include a proposed approximate 40-foot by 40-foot (12-meter by 12-meter) fenced tower compound. The project would also include a proposed approximate 100-foot long (30-meter) buried fiber route.

Table 1: APE for Direct Effects Description

Proposed Tower Compound	Proposed Fiber Route	Additional Easements
40-foot by 40-foot (12-meter by 12-meter)	100-foot length (30-meter)	NA
The total Direct APE is approximately 0.04 acres (0.02 hectares).		

ECA understands that the Pascua Yaqui Tribe plans to construct a 75-foot tall monopole structure within a proposed tower compound. The proposed tower compound would be located within a dirt lot. The proposed undertaking would also include a proposed buried fiber route, which would extend in a generally northeasterly direction from the tower compound across the dirt lot, ending at an existing utility pole.

Table 2: Project Location Information

Tower Coordinates (NAD83) (degrees/minutes/seconds)	Tower Coordinates (UTM)	Tower Elevation (feet/meters)	Township/Range/Section	Legal Description
N32° 11' 5.60" W110° 59' 1.55"	Zone 12N 501531E 3560930N	2402 / 732	14S / 13E / 26	NW ¼ of the SE ¼ of Section 26

ENVIRONMENTAL SETTING

Geologically, the project area is located within the Basin and Range Physiographic Province of Arizona. With long mountain ranges and flat dry deserts, the Basin and Range region stretches from eastern California to central Utah and from southern Idaho into Mexico (NPS 2023). The geological unit mapped in the proposed project area consists of Quaternary Surficial Deposits, Undivided (Q), specifically unconsolidated to strongly consolidated alluvial and eolian deposits. This unit includes coarse, poorly sorted alluvial-fan and terrace deposits on middle and upper piedmonts and along large drainages; sand and clay on alluvial plains and playas; and wind-blown sand deposits (Richard et al. 2000).

According to the USDA Web Soil Survey, soils located within the proposed project area include Grabe silty clay loam (Gm). Descriptions of the mapped soil types can be found in the table below.

Table 3: Mapped Soil Types within the Project Area

Mapped Soil Type	Soil Series Description	Known Subsoil	Typical Subsoil Depth Below Surface
Grabe	Consists of very deep, well drained soils formed in stratified alluvium	Grayish brown (10YR 5/2) very fine sandy loam, dark brown (7.5YR 3/2) moist	16-26 inches (15-56 cm)

(Source: NRCS)

CULTURAL HISTORY

The Paleoindian period (11,000–7500 B.C.) represents the earliest well-documented occupation of North America. Paleoindian lifeways were based on small, nomadic bands that hunted megafauna and gathered wild plants. Material culture associated with the Paleoindian period generally consists of stemmed and fluted projectile points, and archaeological sites discovered that date to this period are associated specifically with the Clovis culture. Sites from this period have been documented in southern Arizona (Cordell 1984; Haury 1950; Huckell 1982, 1984). Pleistocene megafauna have also been discovered in the Prescott area as well as in Mesa and Gilbert (Hermann 2007; Tessman et al. 2000; Walbert 2008).

The Archaic period (7500 B.C.–A.D. 300/500) is divided into Early Archaic, Middle Archaic, and Late Archaic/Early Agricultural period. Early Archaic (7500–4800 B.C.) people followed a generalized hunter-gatherer lifeway and a subsistence-settlement strategy involving high residential mobility, annual procurement rounds, and a wide interaction sphere. By the Middle (4800–1500 B.C.) and Late Archaic (1500 B.C.–A.D. 300), populations began settling in semi-permanent and/or permanent villages of circular pithouses where inhabitants focused on cultivating maize and foraging for wild plants. The late Archaic is also considered to be the Early Agricultural period due to the introduction of maize agriculture in the Southwest United States (Huckell 1990; Mabry et al. 1997; Roth 1992).

The Formative/Ceramic Period (A.D. 1-A.D. 1450) represents new features of subsistence, technology, and society throughout North America. Key features of the Formative/Ceramic period

include specialized subsistence strategies, sophisticated environmental management strategies, long distance exchange and resource distribution networks, sophisticated socio-political structures, and elaboration of technology. There was also widespread implementation of utilitarian ceramic-container technologies across central and southern Arizona during this time. This period is divided into the Early Ceramic period, pre-Classic period, and the Classic period (Dean 1991). The early Ceramic period witnessed the increasing development of agriculture, pottery, and the establishment of settled villages (Doyel 1993; Wilcox et al. 1981). The pre-Classic period (A.D. 450 – A.D. 1150) is considered as the beginning of what we call the Hohokam culture. This period is characterized by use of irrigation canals, cremation burial practices, manufacturing of marine shell and turquoise jewelry, implementation of red-on-brown pottery that was decorated with a reddish ochre-based paint, and settlements ranging from small farmsteads to large villages that included ball courts, ceremonial structures, and central plazas (Doelle 1985; Haury 1976; Arizona State Museum 2023). The Classic period consisted of the end of the ball court era, expansion of irrigation systems, widespread settlement reorganization, shift in architectural styles, significant changes in pottery, changes in burial practices (specifically an increase in inhumation practices), and reorganization of exchange networks (Downum and Bostwick 2003; Doyel 1981; Gregory 1987; McGuire and Howard 1987).

The Protohistoric period (A.D. 1450/1500–1750) represents the transition from the Hohokam Classic period to the Spanish Mission period in Arizona and throughout the Southwest. This transition is marked by the abandonment of many of the large Hohokam village settlements (Doelle 1981; Fish et al. 1992; Gilpin and Phillips 1998; Wilcox and Masse 1981). The O’odham people inhabited most of the lands across southern Arizona prior to the arrival of Europeans. The O’odham presence extended west to the Gulf of California, east to the San Pedro River, north to Central Arizona, and south to Sonora, Mexico. (Bostwick et al. 1996; BRW 1989:86; Chenault 1996, 2000; Greenwald et al. 1996:276–277; Tohono O’odham Nation 2016; Zyniecki 1996).

The Spanish lost control of the region that would become Arizona until 1821 when Mexico gained its independence. In 1848, much of what is now southern Arizona became part of the United States through the Treaty of Guadalupe Hidalgo and the remainder was acquired through the Gadsden

Purchase in 1853. Little Euroamerican activity occurred in the territory until 1848–1849 when discoveries of gold in California, caused speculators to begin traveling in larger numbers across the New Mexico territory to reach the west coast. Following the end of the California gold rush in the late 1850s, enterprising speculators began looking to the neighboring territory for gold. The discovery of placer gold deposits along the Gila River (1858) and Colorado River (1862) immediately sparked a surge of commerce, settlement, and activity in Phoenix Basin. By 1864, miners had established settlements in the Bradshaw Mountains and the foothills along the lower Verde River (Carlson 1996; Spicer 1962). After the Republic of Mexico gained its independence in 1821, the O’odham fell under Mexican rule. Then the Gadsden Purchase divided O’odham virtually in half between the United States of America and Mexico. The increase in Euroamerican settlement throughout the United States half of the region during the 19th century and the Plan de Iguala in Mexico resulted in the demise of O’odham lands both north and south of the border. In 1927, Mexico designated reserves of lands for indigenous people, and approximately nine O’odham communities exist near the southern edge of the Tohono O’odham Nation today. In the U.S., the O’odham bands are now split into four federally recognized tribes that are now politically and geographically distinct [Tohono O’odham Nation, Gila River Indian Community, Ak-Chin Indian Community, and Salt River (Pima Maricopa) Indian community]. Additionally, the Hia-C’ed O’odham band is not federally recognized but lives throughout southwestern Arizona. The modern border between the U.S. and Mexico has negatively affected the O’odham spiritual and cultural lifeways due to passport requirements and regulations on what materials are allowed to be transported across the border within their own traditional lands (Tohono O’odham Nation 2016).

The Pascua Yaqui people currently residing near present-day Tucson, Arizona are descendants of people who once inhabited lands throughout the southwestern United States and northern Mexico. The Yaqui and their ancestors have lived in Arizona for thousands of years. They trace their ancestry back to the Sonoran Desert People and include the peoples of the Hohokam, early ceramic, and early agriculture periods as a part of their lineage. Prior to European contact, the Yaqui people lived in a society based on hunting, gathering, and agriculture and spoke the Uto-Aztecan dialect of Cáhita, which people continue to speak today (Yucupicio 2021).

When the Spanish arrived in Arizona in the 16th century they were helped by Yaqui guides. Beginning with European contact in the 16th century, the Yaqui began to incorporate Jesuit-based Catholicism into their indigenous spiritual belief system to construct a unique religious tradition based on Waehma (Cuaresma/Lent) societal customs. The presence of the Yaqui in Arizona is documented in the records of the Spanish colonial missions in the 18th and 19th centuries. Over the next few centuries, the Yaqui people integrated more and more European political and societal traditions into their own to fit their needs or, as a result of force by external colonial and post-colonial powers. Persecution of the Yaqui people intensified during the period of Mexican control in Arizona. “It was the strategy of the Yaqui People to disguise their heritage to avoid further persecution by these invading forces.” As a result, the record of the Yaqui in Arizona in the 19th century becomes harder to establish (Yucupicio 2021). With the end of the Mexican-American War, control of Arizona was ceded to the United States and a political boundary separated the Yaqui people of Arizona and the southwestern United States and the Yaqui in northern Mexico.

Within Mexico, the Spanish and Mexican colonization led to attack on Yaqui lands and sovereignty. Towards the end of the 19th century, the Yaqui people continued to fight a guerrilla war to hold strong against the Mexican government. The Mexican government forced thousands of Yaqui people to relocate to distant Mexican towns and took Yaqui children from their homes to place them in Mexican households to be raised as Mexicans. This led to Yaqui families migrating to what is now southern Arizona to escape the Mexican government during and after the Mexican Revolution from 1910-1920. The refugees set up settlements at Barrio Libre and Pascua near Tucson, at Guadalupe and Scottsdale near Phoenix, and at Somerton in the western part of Arizona. In 1964, the Pascua Yaqui were awarded 202 acres of land, and in 1978 the Pascua Yaqui Tribe of Arizona became the last federally recognized tribe to secure their recognition before the modern Federal Acknowledgement Process with the Bureau of Indian Affairs was instated (Miller 2004; University of Arizona 2023). Today, the tribe has nine communities: the New Pascua Reservation, Old Pascua in Tucson, Barrio Libre in South Tucson, Guadalupe in metro-Phoenix, Penjamo in Scottsdale, High Town in Chandler, Coolidge, Eloy, and Marana in northwest Tucson (University of Arizona 2023).

Of these communities, the Barrio Libre community is closest to the proposed project area. Barrio Libre is known as Tucson's oldest Spanish-speaking neighborhood and was established in the 18th century near the Spanish fort, Presidio de San Agustin del Tucson. The neighborhood is near a large spring and was settled by local ranchers and laborers from the fort. The greatest period of growth occurred after the railroad came to Tucson in 1880. The rows of adobe buildings that characterize this neighborhood were constructed over the next two decades. According to the NPS "Barrio Libre still retains 19th century Hispanic traditions of urban form and architecture. The concentration of Sonoran, Transitional and American Victorian adobes contribute to the district's sense of timelessness." (NPS). The number of Yaqui inhabiting the Tucson area and Barrio Libre increased significantly between 1887 and 1910, when thousands of Yaqui fled Mexico and migrated to southern Arizona (Miller 2004). The Feast Day of Saint Martin De Porres is a Yaqui ceremony celebrated at the Church of San Martin de Porres in Barrio Libre (Pascua Yaqui website).

LAND USE HISTORY

Historic aerial photographs and maps were reviewed. The project area was agricultural land in 1956. By 1966, Interstate 19 had been constructed and the project area appears to no longer be agricultural in use. Due to its close proximity, it is likely that interstate construction previously disturbed the project area. Evidence for land clearing and grading is apparent in the 1992 aerial photograph in preparation for the construction of the church on the parent tract. The project area has been a mixture of dirt and brush since at least 1992. At the time of ECA's field survey, construction debris including cinder blocks and other concrete fragments were piled up within the tower compound area. It would appear that the tower compound area is currently used as a dump site and has likely been used as a dump site in the recent past.

CLASS I PREVIOUS RECORDS REVIEW

A Class I records search of cultural resource records within the APE for direct effects and the ½-mile APE for visual effects was conducted using the online Arizona's Cultural Resource Inventory (AZSITE) and consultation with Dr. Karl Hoerig, Tribal Historic Preservation Officer for the Pascua Yaqui Tribe. ECA also conducted research for historic properties in the area using the

National Register of Historic Places (NRHP) website, applicable topographic maps, and historic aeriels. Background research was used to determine if any identified archaeological sites, surveys, or historic properties were located within the APE for visual and/or direct effects. Eight previously identified cultural resources are located within the ½-mile APE for visual effects and are discussed in table 4 below. Seventy-one previously conducted cultural resource surveys were identified within a 1-mile research radius of the proposed project and are discussed in table 5 below.

Table 4: Cultural Resources Identified Within APEs

Resource Number	Resource Name	Resource Type	NRHP Eligibility	Visibility
AZ BB:13:17 (ASM)	Julian Wash Site	Prehistoric Hohokam village site with preceramic components, and historic 20 th century house foundation component	Eligible Individually	Tower Visible
AZ BB:13:95 (ASM)	NA	Prehistoric and historic Hohokam and O’odham artifact scatter with hearths	Eligible Individually	Tower Visible
AZ BB:13:96 (ASM)	NA	Prehistoric and historic Hohokam and O’odham artifact scatter, possible village site	Eligible Individually	Tower Visible
AZ BB:13:97 (ASM)	NA	Prehistoric Hohokam artifact scatter with cremation vessel	Eligible Individually	Tower Visible
AZ BB:13:539 (ASM)	NA	Historic 20 th century cement-lined irrigation ditch	Eligible Individually	Tower Visible
AZ BB:13:832 (ASM)	NA	Historic canal segments	Recorder considered eligible – SHPO has not evaluated	Tower Visible
AZ BB:13:833 (ASM)	NA	Historic canal segments with concrete headgates	Recorder considered eligible – SHPO has not evaluated	Tower Visible
Structure 38083	NA	Historic 20 th century home	unevaluated	Tower Not Visible

**Table 5: Previously Conducted Cultural Resource Surveys
Identified Within a 1-Mile Radius of the Project Area**

Report #	Title	Author Organization	Within Direct Effects?
1994-324.ASM	PENNSYLVANIA-6TH MAIN REPLACEMENT SURVEY	DESARC	No
1997-28.ASM	Kino Community Center Reclaimed Water Main Project	DESARC	No
12-42.BLM	Unknown	null	No
2000-116.ASM	Jct. I-19 - Craycroft Rd.	ENTRANCO	No
1989-192.ASM	City of Tucson Silverlake Road Survey	asm	No
1993-213.ASM	Julian/Rodeo Wash Survey	CES	No
2000-822.ASM	Tucson Maintenance - I-10	ARS	No
2005-757.ASM	Sunset Villa Pedestrian Enhancement Project	DESARC	No
2004-23.ASM	Santa Cruz Sports Park	DESARC	No
2008-422.ASM	El Puente Ln. Access Road Survey for ADOT	ECOPLAN	No
2005-837.ASM	Yaqui Park	ARS	No
2008-321.ASM	COT 08-09St. John's School Neighborhood Park	SWCATUS	No
2006-318.ASM	Pennsylvania-Lundy Main Survey	DESARC	No
1991-183.ASM	ORMSBY PARK MAIN SURVEY	DESARC	No
2000-412.ASM	Closed Landfill Survey	DESARC	No
1998-266.ASM	6th Ave- 18th St. to I-10 Survey	DESARC	No
2003-248.ASM	South 10th Avenue Revitalization Survey	DESARC	No
1999-3.ASM	Lot 14 Pershing Addition Survey	DESARC	No
2001-246.ASM	Wakefield 9th Avenue Survey	DESARC	No
1991-82.ASM	Michigan Street-12th Avenue Main Replacement Plan No. 1-197-161-90	DESARC	No
1998-43.ASM	6th Ave. I-10 to Ajo Way Survey	DESARC	No
2003-230.ASM	CTA51 (South Gravity Main Survey)	DESARC	No
2004-541.ASM	I-10/6th Avenue Bridge, Aristic Fencing and Sidewalk Improvements	HDR	No
2004-532.ASM	Rose Neighborhood Playground Survey	DESARC	No
2001-401.ASM	Ajo Way Landscaping Survey	DESARC	No
1995-328.ASM	COTTONWOOD/40TH ST. SURVEY	DESARC	No
2001-19.ASM	Starr Pass AZ0173 Communications Tower Survey Project	OPAC	No
2004-273.ASM	Mission Creek Apt. Survey	AZTLAN	No

Report #	Title	Author Organization	Within Direct Effects?
1997-73.ASM	Southside Gravity Main Rehabilitation Project	DESARC	No
1985-184.ASM	Archaeological Investigations of Project I-19-1-401, Tucson	asm	Yes
1994-172.ASM	SR 86	ARS	No
2002-276.ASM	West Silverlake Archaeological Survey	SWCATUS	No
1993-361.ASM	COTTONWOOD LANE RIPRAP CONSTRUCTION PROJECT	CES	No
1998-36.ASM	Silverlake DPI: I-10 to Mission Survey	DESARC	No
1999-93.ASM	6th Ave./Ajo Way Main Survey	DESARC	No
1991-182.ASM	LIBERTY AVE. - PALMDALE ST. 1-228-094-91	DESARC	No
1992-219.ASM	SOUTH TUCSON PROJECT	DESARC	No
2000-284.ASM	Moratorium Streets Survey	DESARC	No
2000-153.ASM	Santa Cruz Bikepath Survey	DESARC	No
1995-392.ASM	SPEEDWAY/AJO PIPELINE	DESARC	No
2005-314.ASM	430 W Lincoln Street Survey	DESARC	No
2010-259.ASM	Belmar Survey	TIERRA	No
2011-406.ASM	Atlas 62 Standby Monitoring	AZTLAN	No
2005-519.ASM	Manning Lane Main Survey	DESARC	No
2012-612.ASM	44th St. and 16th Ave. Monitoring	NTHLD	No
2012-300.ASM	Paseo de las Iglesias Phase I	SWCATUS	No
2008-587.ASM	Mission Creek Survey	AZTLAN	No
1980-114.ASM	Kennedy Park Estates/Mission Knolls I, Mission Road North of Ajo	asm	No
1997-320.ASM	Archaeological Survey for the 22nd Street and I-10 Area Main Replacement Project	DESARC	No
2002-17.ASM	Landfill Monitor Well Survey	DESARC	No
2005-353.ASM	West Branch	LSD	No
2008-455.ASM	Julian Wash Siphon Project	SWCATUS	No
2008-355.ASM	EPNG Line 1007 FERC Reports & Baseline Studies	SWCATUS	No
2010-217.ASM	Santa Cruz River Project between Ajo and Silverlake	SWCATUS	No
2011-246.ASM	Paseo de las Iglesias Phase I	SWCATUS	No
2015-485.ASM	Atlas 0056 Monitoring	TIERRA	No
1999-592.ASM	Tucson Maintenance I-19	ARS	No
2007-332.ASM	I-29 San Xavier Rd to Ajo Way	LSD	Yes

Report #	Title	Author Organization	Within Direct Effects?
2008-695.ASM	I-19 Sign Rehab	LSD	No
1999-362.ASM	Phase I of the Tucson Freeway Management System	DAMES	No
1979-38.ASM	Santa Cruz River Park Survey	asm	No
1987-222.ASM	U.S. Telecom Buried Fiber Optic Cable	DAMES	No
2003-1070.ASM	EPNG Tucson Class III Survey	SWCATUS	No
2004-1040.ASM	Farmacy (Sic) Garden	HEG	No
2007-223.ASM	Julian Wash Monitoring	DESARC	No
2012-76.ASM	Cultural Resources Inventory of a Portion of The Loop	WSA	No
2013-295.ASM	El Paso Railroad Track and Culvert Documentation	DESARC	No
2018-471.ASM	3314 South 16th Avenue	ECOPLAN	Yes
2020-285.ASM	COT Michigan-Fair Bicycle Boulevard	TIERRA	No
2015-6.ASM	Southeast Interceptor Class III	WEST	No
2012-490.ASM	Paseo de las Iglesias Data Recovery Project	DESARC	No

General Land Office (GLO) maps were checked for historic properties in the area. The 1871 GLO Map shows no cultural resources within or near the project area (1871 GLO Map).

ASSESSMENT OF VISUAL EFFECTS

AZ BB:13:17(ASM): The proposed tower would be visible from many southern and western locations of archaeological site AZ BB:13:17(ASM) which has been previously determined by AZ SHPO to be NRHP-eligible. However, the surrounding viewshed has undergone modern commercial and residential development including Interstate 19 immediately west and north of the tower location, and modern overhead utility corridors to the west of AZ BB:13:17(ASM). Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:95 (ASM): The proposed tower would be minimally visible from archaeological site AZ BB:13:95 (ASM) which has been previously determined by AZ SHPO to be NRHP-eligible.

However, there is a modern overhead utility corridor with large transmission towers passing through the site. The proposed tower would be over 2,000 feet away and would be far less visually intrusive than the existing transmission towers within AZ BB:13:95 (ASM). Given the minimal visibility of the proposed tower and the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:96 (ASM): The proposed tower would be minimally visible from archaeological site AZ BB:13:96 (ASM) which has been previously determined by AZ SHPO to be NRHP-eligible. However, there is a modern overhead utility corridor with large transmission towers passing through the site and a 20th century residential subdivision immediately to the west. The proposed tower would be over 2,600 feet away and would be far less visually intrusive than the existing transmission towers within AZ BB:13:96 (ASM) and the adjacent modern residential subdivision. Given the minimal visibility of the proposed tower and the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:97 (ASM): The proposed tower would be minimally visible from archaeological site AZ BB:13:97 (ASM) which has been previously determined by AZ SHPO to be NRHP-eligible. However, there is a modern overhead utility corridor with large transmission towers passing through the site as well as a modern six-lane highway with sound barrier wall immediately to the south and Interstate 19 immediately to the east. The proposed tower would be over 2,800 feet away and would be far less visually intrusive than the existing transmission towers within AZ BB:13:97 (ASM) and adjacent highway and interstates to the south and east. Given the minimal visibility of the proposed tower and the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:539 (ASM): The proposed tower would be minimally visible from archaeological site AZ BB:13:539 (ASM) which has been previously determined by AZ SHPO to be NRHP-eligible.

However, there is a modern overhead utility corridor with large transmission towers within the existing viewshed as well as Interstate 19 with light poles and overhead signage immediately to the east. Given the existing modern intrusions in the viewshed, it is ECA's opinion that the proposed undertaking would not diminish the existing setting. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:832 (ASM): The proposed tower would be minimally visible from archaeological site AZ BB:13:832 (ASM). However, the site has not been formerly recommended eligible for listing in the NRHP by AZ SHPO. Additionally, there is a modern overhead utility corridor with large transmission towers within the existing viewshed as well as Interstate 19 with light poles and overhead signage immediately to the east. Site AZ BB:13:832 within the ½ mile visual APE consists of four separate locations. During ECA's site visit, only two of these locations were publicly accessible. The proposed tower is slightly visible from two of the locations and is presumably also visible from the other two locations that could not be visited. However, the proposed tower would be far less visually intrusive than the existing transmission towers within the viewshed and adjacent interstate to the south and east. Given the minimal visibility of the proposed tower and the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:833 (ASM): The proposed tower would be minimally visible from archaeological site AZ BB:13:833 (ASM). However, the site has not been formerly recommended eligible for listing in the NRHP by AZ SHPO. Site AZ BB:13:833 within the ½ mile visual APE consists of two separate locations. Additionally, there is a modern overhead utility corridor with large transmission towers within the existing viewshed as well as modern residential subdivisions immediately to the west. The proposed tower would be over 2,400 feet away and would be far less visually intrusive than the existing transmission towers within the viewshed and adjacent modern residential subdivisions. Given the minimal visibility of the proposed tower and the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing

setting. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

Structure No. 38083 is located within the APE for visual effects and has not been evaluated for the NRHP by the Arizona SHPO. *Structure No. 38083* is located at 707 W. 42nd Street in Tucson, Arizona. According to the Pima County Property Assessor, the building was constructed in 1939. It consists of a one-story, masonry vernacular structure set on a continuous concrete foundation. The building is rectangular in plan with a front gable, metal-covered roof featuring gable end vents. The building is constructed of concrete block covered with stucco and is two bays wide by three bays deep. The main entry is located on the north façade and consists of a single door. The windows are generally centered within the bays and feature one-over-one metal sash windows.

It is the opinion of ECA that *Structure No. 38083* is not eligible for the NRHP. Based on the architectural design, the plain masonry vernacular building represents a conventional design prevalent in twentieth-century residential architectural in the southwest and throughout the United States. Primarily a masonry building with no defined architectural style, the building does not have any distinctive characteristics of any architectural typology to be a significant example of its type, period, or method of construction. As such, the building is not observed to be architecturally significant (Criterion C). No information was uncovered to suggest the property is associated with events that have made a significant contribution to broad patterns of our history (Criterion A), lives of significant persons (Criterion B), or that it is likely to yield information important in history or prehistory (Criterion D). As such, it is the opinion of ECA that the building is not a Historic Property in the APE for visual effects. Additionally, based on ECA's viewshed assessment, the proposed tower would not be visible from structure 38083.

ASSESSMENT OF DIRECT EFFECTS

Field Conditions

The parent tract borders Interstate 19 and contains a modern church with associated outbuildings. The proposed tower compound would be located in an area of exposed earth that contains a concrete debris pile. The project area appears to have been previously graded. The proposed fiber route would traverse in a northeasterly direction from the tower compound through an area of exposed earth mixed with grasses/bushes until reaching an existing overhead utility pole west of a paved cul-de-sac. The proposed tower location is generally flat with little to no slope.

Table 6: Surface Visibility within the APE for Direct Effects

Tower Compound	Fiber Route	Additional Easements
80 to 100% due to exposed earth	0% in grassed areas and 100% in areas of exposed earth	NA

Field Methods

The methodology for the Class III Cultural Resources Survey for this project was determined by the professional opinions and experience of our principal and staff archaeologists, applicable SHPO guidelines, and applicable tribal guidelines. The survey was performed Shannon Lowman, MA, RPA, Principal Archaeologist, of ECA on May 17, 2023. Approximately one hour of field time was recorded for the Class III Cultural Resources Survey.

A pedestrian survey was conducted over the project site by visual inspection of exposed ground surfaces throughout the proposed tower compound, the proposed fiber route, and all of the immediately adjacent areas. Visual inspections were conducted at approximately 15-foot (5-meter) intervals.

The proposed project area lies within archaeological site **AZ BB:13:17 (ASM)**. The site form shows a very large site boundary approximately 290 acres in size. Significant portions of land

within the site boundary have been subjected to modern commercial and residential development and Interstate 19 passes through the site. This site contains components related to the Preceramic period (1,200 BC – AD 500), Hohokam Colonial Period (AD 750 – AD 950), the Hohokam Sedentary Period (AD 950 - AD 1100), and the late Historic Period (AD 1900 – AD 1950). Artifacts and features were first identified in 1958 on the terrace and floodplain along the Santa Cruz River. During subsurface testing for a city water plant reservoir in 1990, historic canals and shallow pit features containing ceramics and burned bone fragments were discovered. A survey in 1992 for an access easement to the water plant identified a high surface artifact density on the river terrace and multiple pithouse, pit, and rubbish pit features. In 1996, archaeological testing along the channelized Julian Wash identified dozens of pithouse features among other pit features and human remains. In 2000, testing near the I-10 and I-19 interchange identified ninety-four pithouses and an historic period foundation possibly associated with the former St. Joseph's Children's home. Additional pithouse and burial features were identified on the western edge of the archaeological site during an SWCA survey in 2006. Lithic and pottery surface scatters have also been identified along residential streets in the Sunset Villa neighborhood northeast of the proposed tower location.

Although no previous surveys identified artifacts or features within the proposed project's APE for direct effects, it is clear that a surface scatter of ceramics and lithics in variable density exists across the archaeological site. Artifacts are even found on the surface alongside roadways in substantially developed residential and commercial areas and in the ROW of Interstate 19. Although surface finds may have once existed within the APE for direct effects, ECA did not identify any such artifacts during our pedestrian survey. This is most likely due to previous earth moving activity identified in historic aerial photographs related to the development and maintenance of the church on the parent tract. It does not appear that any component of site AZ BB:13:17 (ASM) is within the project's APE for direct effects. As a result, it is ECA's opinion that the proposed project would have no direct effect on site AZ BB:13:17 (ASM).

SUMMARY

ECA has assessed the effects of the telecommunications facility on known historic properties.

Direct APE: Site AZ BB:13:17 (ASM) encompasses the APE for direct effects. However, the project area has been previously disturbed, and no archaeological artifacts or cultural features were identified during ECA's field survey. Therefore, it is ECA's opinion that AZ BB:13:17 (ASM) would not be directly affected by the proposed undertaking.

Visual APE: Seven previously recorded archaeological sites [AZ BB:13:17 (ASM), AZ BB:13:95 (ASM), AZ BB:13:96 (ASM), AZ BB:13:97 (ASM), AZ BB:13:539 (ASM), AZ BB:13:832 (ASM), and AZ AA:13:833 (ASM)] and one previously recorded historic structure (structure 38083) are present within the 1/2 -mile visual APE. Five of the cultural resources have been previously determined NRHP-eligible by AZ SHPO while the remaining three cultural resources are unevaluated. ECA is of the opinion that the proposed tower would not diminish the setting of any historic properties. Accordingly, a finding of "No Adverse Effect" is recommended.

RECOMMENDATIONS

During the course of this Class III Cultural Resources Survey, archaeological site AZ BB:13:17 (ASM) was identified within the APE for direct effects. However, the project area has been previously disturbed, and no archaeological artifacts or cultural features were identified during ECA's field survey. Further, although there are historic resources within the viewshed of the proposed undertaking, it is ECA's opinion that those resources would not be adversely affected. Therefore, we recommend a finding of "No Adverse Effect" for the proposed undertaking. If inadvertent discoveries of buried cultural materials or human remains are found during construction, all work should cease and potentially affected Tribes, as well as the State Historic Preservation Office should be notified immediately.

CLOSURE

We are submitting this report for the Pascua Yaqui Tribe to seek concurrence with our finding and to comply with NTIA requirements under the National Historic Preservation Act. Shannon Lowman, MA, RPA, performed the fieldwork and reviewed this assessment. Matthew Beazley, MA, RPA, Principal Investigator, authored this report. We request your concurrence with our finding. Please contact our office with questions or comments or if additional information is required.

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Old Pascua Tower Site

PASCUA YAQUI TRIBE

DEPARTMENT OF LANGUAGE AND CULTURE ITOM HIAK LUTU'URIA YO'ORIWA INTO NAKWA



September 15, 2023

Shannon Lowman, MA, RPA
Principal Archaeologist/Assistant Tribal Coordinator
Environmental Corporation of America
1375 Union Hill Industrial Court
Alpharetta, GA 30004

Dear Ms. Lowman,

I am writing in response to your request for consultation regarding the planned installation of communications fiber and towers in various Pascua Yaqui communities in Arizona.

23-001205: Guadalupe

The Pascua Yaqui Tribal Historic Preservation Office (PYTHPO) concurs with the determination of "no adverse effect" to historic properties for the collocation of broadband devices on the building located at 9405 S. Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona.

23-001191: Coolidge

PYTHPO concurs with the determination of "no adverse effect" to historic properties for the construction of a communications tower and associated fixtures in Coolidge, Pinal County, Arizona.

23-001200: Marana

PYTHPO concurs with the determination of "no adverse effect" to historic properties for the construction of a communications monopole tower and associated fixtures on Pascua Yaqui Tribal fee land at Yoem Pueblo, Marana, Pima County, Arizona.

23-001190: Milagros (Barrio Libre)

PYTHPO concurs with the determination of "no adverse effect" to historic properties for the construction of a communications monopole tower and associated fixtures, including the installation of a 100 foot long buried fiber route, with the following conditions: The project site is within the boundaries of NRHP-eligible archaeological site AZ BB:13:17 (ASM) and is within the City of Tucson's Julian Wash Archaeological Sensitivity Zone. All initial ground disturbance for this project should be monitored by a qualified archaeologist. PYTHPO will provide monitoring for work completed on the Tribe's fee lands. Ground disturbance that occurs in the City of Tucson ROW must be monitored by a city-approved archaeological monitor. Per Tohono O'Odham Nation request, excavation for the fiber line should be completed by use of a back hoe rather than a trencher to facilitate identification of any subsurface cultural materials that might be present.

Hiak Noki
Language Program

Itom Sauwa'u
Traditional Arts Program

Hiak Etehori, Hiak Lutu'uria
History and Culture Program

Veeme Ya'uchia
Miss Pascua Yaqui Program

5100 W. Calle Tetakusim • Tucson, Arizona 85757 • Phone (520) 879-5939 • FAX (520) 879-5747
E-mail: LanguageAndCulture@pascuayaqui-nsn.gov

23-001365: Tortuga Ranch to New Pascua Pueblo

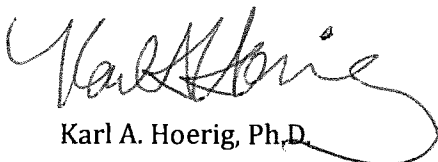
PYTHPO concurs with the determination of “no adverse effect” to historic properties for the installation of buried and aerial fiber between the Tribe’s Tortuga Ranch and locations on the Tribe’s reservation and trust lands at New Pascua Pueblo with the following conditions: Contractors will consult with PYTHPO to flag for avoidance any remaining unexcavated/mitigated portions of AZ AA:16:440(ASM) and the stone ring identified as IF 3 in the “Yaqui Square” development area on the Tribe’s reservation and trust lands. Should an any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

23-001203: Old Pascua Village

This project will be undertaken on lands that are in the process of conversion from Pascua Yaqui Tribe fee lands to Trust lands, and as such will be subject to review by the PYTHPO. The APE includes a portion of the National Register-listed Antonio Matus House and Property and the entirety of the APE is located within the City of Tucson Stone Pipe Archaeological Sensitivity Zone. Because the communications tower is an existing facility, this project should meet the standard of “no adverse effect” to historic properties. Project contractors must take care to avoid any ground disturbance or other activities what would cause adverse effect to the historic house, including any changes to precipitation runoff patterns that would increase moisture near the house. No trenching should be undertaken adjacent to the historic house. If any ground disturbance will occur within the City of Tucson ROW, an outside archaeological monitor must be utilized to meet City requirements in the Archaeological Sensitivity Zone. Should any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

If you have any additional questions or concerns about these projects, or require any additional review by our office, please contact me at (520) 883-5116 or karl.hoerig@pascuayaqui-nsn.gov.

With warmest regards,



Karl A. Hoerig, Ph.D.

Pascua Yaqui Tribal Historic Preservation Officer

Class III Cultural Resources Survey
Proposed Collocation of Antennas on an Existing 80-Foot Tall Overall Height
Self-Supporting Lattice Telecommunications Structure and
Addition of Ground Level Equipment
856 W Calle Santa Ana
Tucson, Pima County, Arizona



ECA Project#: 23-001203

TCNS ID #: Pending

Report Date: July 13, 2023

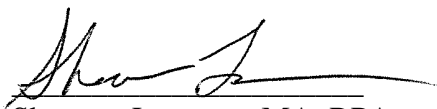
Submitted to:

Dr. Karl Hoerig
Tribal Historic Preservation Officer
Pascua Yaqui Tribe
7777 S. Camino Huivisim, Building C
Tucson, AZ 85757

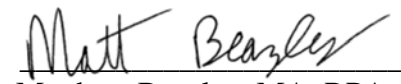
Lead Federal Agency:

National Telecommunications and Information Administration

Submitted By:


Shannon Lowman, MA, RPA
Principal Archaeologist




Matthew Beazley, MA, RPA
Principal Investigator

ABSTRACT

Environmental Corporation of America's client, Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to modify an existing telecommunications facility as described in the following Class III Cultural Resources Survey Report. The existing facility consists of an 80-foot tall (overall height) self-supporting lattice telecommunications structure located at 856 W Calle Santa Ana, Tucson, Pima County, Arizona. Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) is proposing to install antennas on the existing self-supporting lattice tower structure and install associated ground level equipment. The proposed undertaking would occur on land that is held in trust for the Pascua Yaqui Tribe by the United States Department of the Interior Bureau of Indian Affairs (BIA). Mr. Gary Cantley, Regional Archaeologist with the BIA Western Regional Office notified ECA that an Archaeological Resources Protection Act (ARPA) permit was not needed for the Class III Cultural Resources Survey. ECA understands that the proposed project is grant-funded and administered through the National Telecommunications and Information Administration (NTIA). ECA conducted a Class III Cultural Resources Survey of the Area of Potential Effects (APE) consisting of background research, an intensive field survey, and preparation of this report.

A portion of the proposed undertaking would be located within the parcel for the NRHP listed *Antonio Matus House and Property*. During the course of the field survey portion of this Class III Cultural Resources Survey, no archaeological cultural resources were encountered. Further, although cultural resources are present within the viewshed of the proposed undertaking, it is ECA's opinion that those resources would not be adversely affected.

ECA believes that the proposed undertaking would have no adverse effect on any historic properties that are listed in or eligible for listing in the National Register of Historic Places. Based on our findings, we recommend a finding of "No Adverse Effect," and no further consultation under Section 106 Review of the National Historic Preservation Act for this proposed undertaking.

TABLE OF CONTENTS

ABSTRACT.....	1
TABLE OF CONTENTS.....	2
LIST OF FIGURES	3
LIST OF PHOTOGRAPHS.....	3
INTRODUCTION	5
AREAS OF POTENTIAL EFFECTS (APEs).....	5
ENVIRONMENTAL SETTING	6
CULTURAL HISTORY.....	7
LAND USE HISTORY.....	12
CLASS I PREVIOUS RECORDS REVIEW	12
ASSESSMENT OF VISUAL EFFECTS.....	15
ASSESSMENT OF DIRECT EFFECTS.....	19
SUMMARY	20
RECOMMENDATIONS.....	21
CLOSURE	21
REFERENCES CITED.....	22

Appendix A: Figures

Appendix B: Photographs

**Resumes of key personnel involved with the project can be provided upon request.*

LIST OF FIGURES

Figure 1: APE for Visual Effects

Figure 2: APE for Direct Effects

Figure 3: Site Vicinity Plan

Figure 4: 2023 Aerial Photograph

Figure 5: 2021 Aerial Photograph

Figure 6: 2020 Aerial Photograph

Figure 7: 2012 Aerial Photograph

Figure 8: 2009 Aerial Photograph

Figure 9: 2002 Aerial Photograph

Figure 10: 1996 Aerial Photograph

Figure 11: 1990 Aerial Photograph

Figure 12: 1980 Aerial Photograph

Figure 13: 1956 Aerial Photograph

Figure 14: 1871 GLO Map

LIST OF PHOTOGRAPHS

Photograph A: Northerly View from the Existing Tower

Photograph B: Easterly View from the Existing Tower

Photograph C: Southerly View from the Existing Tower

Photograph D: Westerly View from the Existing Tower

Photograph E: Northeasterly Overview of the Existing Tower

Photograph F: Easterly View of the Proposed Fiber Route

Photograph G: Northerly View of the Proposed Fiber Route, Proposed Generator and Propane Pad, Proposed Cabinet, and Proposed Power Route Options

Photograph H: Easterly View of the Proposed Power Route Option 1

Photograph I: Easterly View of the Proposed Power Route Option 2

Photograph 1A: Overview of the *Antonio Matus House and Property*

Photograph 1B: View from the *Antonio Matus House and Property*

Photograph 2A: Overview of the *Pascua Cultural Plaza*

Photograph 2B: Overview of the *Pascua Cultural Plaza*

Photograph 2C: View from the *Pascua Cultural Plaza*

Photograph 3A: Overview of AZ BB:5:123(ASM)

Photograph 3B: View from AZ BB:5:123(ASM)

Photograph 4A: Overview of AZ BB:9:440(ASM)

Photograph 4B: View from AZ BB:9:440(ASM) and *Juan Bautista de Anza NHT*

Photograph 5A: Overview of AZ BB:13:110(ASM) and *Juan Bautista de Anza NHT*

Photograph 5B: View from AZ BB:13:110(ASM) and *Juan Bautista de Anza NHT*

Photograph 6A: Overview of AZ BB:13:425(ASM)

Photograph 6B: View from AZ BB:13:425(ASM) and *Juan Bautista de Anza NHT*

Photograph 7A: Overview of AZ BB:13:468(ASM) and *Juan Bautista de Anza NHT*

Photograph 7B: View from AZ BB:13:468(ASM) and *Juan Bautista de Anza NHT*

Photograph 8A: Overview of AZ BB:13:86(ASM)

Photograph 8B: View from AZ BB:13:86(ASM)

Photograph 9A: Overview of AZ BB:13:866(ASM) and *Juan Bautista de Anza NHT*

Photograph 9B: View from AZ BB:13:866(ASM) and *Juan Bautista de Anza NHT*

Photograph 10A: View from AZ FF:9:17(ASM)

Photograph 10B: View from AZ FF:9:17(ASM)

INTRODUCTION

Environmental Corporation of America was contracted by Native Network, Inc. (on behalf of the Pascua Yaqui Tribe) to perform a Class III Cultural Resources Survey as part of the Section 106 Review process for a proposed telecommunications facility. The proposed facility would be located at 856 W Calle Santa Ana, Tucson, Pima County, Arizona. The proposed undertaking would occur on land that is owned in held for the Pascua Yaqui Tribe by the United States Department of the Interior Bureau of Indian Affairs (BIA). Mr. Gary Cantley, Regional Archaeologist with the BIA Western Regional Office notified ECA that an Archaeological Resources Protection Act (ARPA) permit was not needed for the Class III Cultural Resources Survey. ECA understands that the proposed project is grant-funded and administered through the National Telecommunications and Information Administration (NTIA). The purpose of our work was to determine whether historic properties might exist within the proposed project APEs for visual or direct effects.

AREAS OF POTENTIAL EFFECTS (APEs)

Area of Potential Effects for Visual Effects

The APE for visual effects is the geographic area or areas within which the facility may directly or indirectly cause alterations in the character or use of historic properties. Based on the height of the existing tower structure and proposed antenna collocation, ECA has defined the visual APE as a ½-mile radius.

Area of Potential Effects for Direct Effects

The APE for direct effects is the area that will be physically impacted by construction of the proposed undertaking. For this project, the APE for direct effect is limited to the existing tower site and associated ground level equipment and utility routes. For this undertaking, the area of disturbance would include the existing tower, a proposed generator/propane pad, proposed equipment cabinet, proposed buried fiber route, and two proposed power route options. A portion of the proposed undertaking would be located within the parcel for the NRHP listed *Antonio Matus House and Property*.

Table 1: APE for Direct Effects Description

Proposed Generator/Propane Pad	Proposed Equipment Cabinet	Proposed Fiber Route	Proposed Power Routes
Approximately 10-foot by 5-foot (3-meter by 1-meter)	28-inch by 22-inch (71cm x 56cm)	approximate 100-foot length (30-meter)	Option 1: Approximately 50-foot length (15-meter) and/or Option 2: Approximately 65-foot length (20-meter)
The total Direct APE is approximately 0.004 acres (0.002 hectares).			

ECA understands that the Pascua Yaqui Tribe plans to install antennas on the existing 80-foot tall self-supporting lattice structure. The existing tower is located within a lightly graveled lot. The proposed undertaking would also include a proposed generator/propane pad and equipment cabinet to be located directly west of the existing tower, a proposed buried fiber route, which would extend in a generally southerly then easterly direction across the graveled lot, ending at an existing utility pole. Additionally, the proposed undertaking would include a proposed power route, which would run in a southerly then easterly direction across the graveled lot to end at an existing power box adjacent to the Old Pascua Museum and Yaqui Culture Center building (option one) or end at an existing power box adjacent to the Culture Center Restroom building (option two).

Table 2: Project Location Information

Tower Coordinates (NAD83) (degrees/minutes/seconds)	Tower Coordinates (UTM)	Tower Elevation (feet/meters)	Township/Range/Section	Legal Description
32°14'53.34"N 110°59'9.71"W	Zone 12N 501316E 3567942N	2338 / 713	14S / 13E / 2	NW ¼ of the NE ¼ of Section 2

ENVIRONMENTAL SETTING

Geologically, the project area is located within the Basin and Range Physiographic Province of Arizona. With long mountain ranges and flat dry deserts, the Basin and Range region stretches from eastern California to central Utah and from southern Idaho into Mexico (NPS 2023). The geological unit mapped in the proposed project area consists of Quaternary Surficial Deposits, undivided, which consists of unconsolidated to strongly consolidated alluvial and eolian deposits.

This includes coarse, poorly sorted alluvial-fan and terrace deposits on middle and upper piedmonts and along drainages; silt, sand, and clay on alluvial plains and playas; and wind-blown sand deposits (Richard et al. 2000).

According to the USDA Web Soil Survey, soils located within the proposed project area include Cave gravelly loam, 0 to 5 percent slopes (CaB) and Grabe soils, 0 to 3 percent slopes (GoB). Descriptions of the mapped soil types can be found in the table below.

Table 3: Mapped Soil Types within the Project Area

Mapped Soil Type	Soil Series Description	Known Subsoil	Typical Subsoil Depth Below Surface
Cave	Consists of very shallow and shallow to a hardpan, well drained soils formed in mixed alluvium	Variegated with pink (7.5YR 8/4) and white (N8/) gravelly loam, pink (7.5YR 7/4) moist	7-12 inches (18-31 cm)
Grabe	Consists of very deep, well drained soils that formed in stratified alluvium	Grayish brown (10YR 5/2) very fine sandy loam, dark brown (7.5YR 3/2) moist	10-16 inches (25-41 cm)

(Source: NRCS)

CULTURAL HISTORY

The Paleoindian period (11,000–7500 B.C.) represents the earliest well-documented occupation of North America. Paleoindian lifeways were based on small, nomadic bands that hunted megafauna and gathered wild plants. Material culture associated with the Paleoindian period generally consists of stemmed and fluted projectile points, and archaeological sites discovered that date to this period are associated specifically with the Clovis culture. Sites from this period have been documented in southern Arizona (Cordell 1984; Haury 1950; Huckell 1982, 1984). Pleistocene megafauna have also been discovered in the Prescott area as well as in Mesa and Gilbert (Hermann 2007; Tessman et al. 2000; Walbert 2008).

The Archaic period (7500 B.C.–A.D. 300/500) is divided into Early Archaic, Middle Archaic, and Late Archaic/Early Agricultural period. Early Archaic (7500–4800 B.C.) people followed a generalized hunter-gatherer lifeway and a subsistence-settlement strategy involving high

residential mobility, annual procurement rounds, and a wide interaction sphere. By the Middle (4800–1500 B.C.) and Late Archaic (1500 B.C.–A.D. 300), populations began settling in semi-permanent and/or permanent villages of circular pithouses where inhabitants focused on cultivating maize and foraging for wild plants. The late Archaic is also considered to be the Early Agricultural period due to the introduction of maize agriculture in the Southwest United States (Huckell 1984; Mabry et al. 1997; Roth 1992).

The Formative/Ceramic Period (A.D. 1–A.D. 1450) represents new features of subsistence, technology, and society throughout North America. Key features of the Formative/Ceramic period include specialized subsistence strategies, sophisticated environmental management strategies, long distance exchange and resource distribution networks, sophisticated socio-political structures, and elaboration of technology. There was also widespread implementation of utilitarian ceramic-container technologies across central and southern Arizona during this time. This period is divided into the Early Ceramic period, pre-Classic period, and the Classic period (Dean 1991). The early Ceramic period witnessed the increasing development of agriculture, pottery, and the establishment of settled villages (Doyel 1981; Wilcox et al. 1981). The pre-Classic period (A.D. 450 – A.D. 1150) is considered as the beginning of what we call the Hohokam culture. This period is characterized by use of irrigation canals, cremation burial practices, manufacturing of marine shell and turquoise jewelry, implementation of red-on-brown pottery that was decorated with a reddish ochre-based paint, and settlements ranging from small farmsteads to large villages that included ball courts, ceremonial structures, and central plazas (Doelle 1985; Haury 1976; Arizona State Museum 2023). The Classic period consisted of the end of the ball court era, expansion of irrigation systems, widespread settlement reorganization, shift in architectural styles, significant changes in pottery, changes in burial practices (specifically an increase in inhumation practices), and reorganization of exchange networks (Downum and Bostwick 2003; Doyel 1981; Gregory 1987; McGuire and Howard 1987).

The Protohistoric period (A.D. 1450/1500–1750) represents the transition from the Hohokam Classic period to the Spanish Mission period in Arizona and throughout the Southwest. This transition is marked by the abandonment of many of the large Hohokam village settlements (Doelle

1981; Fish et al. 1992; Gilpin and Phillips 1998; Wilcox and Masse 1981). The O’odham people inhabited most of the lands across southern Arizona prior to the arrival of Europeans. The O’odham presence extended west to the Gulf of California, east to the San Pedro River, north to Central Arizona, and south to Sonora, Mexico (Bostwick et al. 1996; BRW 1989:86; Chenault 1996; Greenwald et al. 1996:276–277; Tohono O’ dham Nation 2016; Zyniecki 1996).

The Spanish lost control of the region that would become Arizona until 1821 when Mexico gained its independence. In 1848, much of what is now southern Arizona became part of the United States through the Treaty of Guadalupe Hidalgo and the remainder was acquired through the Gadsden Purchase in 1853. Little Euroamerican activity occurred in the territory until 1848–1849 when discoveries of gold in California, caused speculators to begin traveling in larger numbers across the New Mexico territory to reach the west coast. Following the end of the California gold rush in the late 1850s, enterprising speculators began looking to the neighboring territory for gold. The discovery of placer gold deposits along the Gila River (1858) and Colorado River (1862) immediately sparked a surge of commerce, settlement, and activity in Phoenix Basin. By 1864, miners had established settlements in the Bradshaw Mountains and the foothills along the lower Verde River (Carlson 1996; Spicer 1962). After the Republic of Mexico gained its independence in 1821, the O’odham fell under Mexican rule. Then the Gadsden Purchase divided O’odham virtually in half between the United States of America and Mexico. The increase in Euroamerican settlement throughout the United States half of the region during the 19th century and the Plan de Iguala in Mexico resulted in the demise of O’odham lands both north and south of the border. In 1927, Mexico designated reserves of lands for indigenous people, and approximately nine O’odham communities exist near the southern edge of the Tohono O’odham Nation today. In the U.S., the O’odham bands are now split into four federally recognized tribes that are now politically and geographically distinct [Tohono O’odham Nation, Gila River Indian Community, Ak-Chin Indian Community, and Salt River (Pima Maricopa) Indian community]. Additionally, the Hia-C’ed O’odham band is not federally recognized but lives throughout southwestern Arizona. The modern border between the U.S. and Mexico has negatively affected the O’odham spiritual and cultural lifeways due to passport requirements and regulations on what materials are allowed to be transported across the border within their own traditional lands (Tohono O’ dham Nation 2016).

The Pascua Yaqui people currently residing near present-day Tucson, Arizona are descendants of people who once inhabited lands throughout the southwestern United States and northern Mexico. The Yaqui and their ancestors have lived in Arizona for thousands of years. They trace their ancestry back to the Sonoran Desert People and include the peoples of the Hohokam, early ceramic, and early agriculture periods as a part of their lineage. Prior to European contact, the Yaqui people lived in a society based on hunting, gathering, and agriculture and spoke the Uto-Aztecan dialect of Cáhita, which people continue to speak today (Yucupicio 2021).

When the Spanish arrived in Arizona in the 16th century they were helped by Yaqui guides. Beginning with European contact in the 16th century, the Yaqui began to incorporate Jesuit-based Catholicism into their indigenous spiritual belief system to construct a unique religious tradition based on Waehma (Cuaresma/Lent) societal customs. The presence of the Yaqui in Arizona is documented in the records of the Spanish colonial missions in the 18th and 19th centuries. Over the next few centuries, the Yaqui people integrated more and more European political and societal traditions into their own to fit their needs or, as a result of force by external colonial and postcolonial powers. Persecution of the Yaqui people intensified during the period of Mexican control in Arizona. “It was the strategy of the Yaqui People to disguise their heritage to avoid further persecution by these invading forces.” As a result, the record of the Yaqui in Arizona in the 19th century becomes harder to establish (Yucupicio 2021). With the end of the Mexican American War, control of Arizona was ceded to the United States and a political boundary separated the Yaqui people of Arizona and the southwestern United States and the Yaqui in northern Mexico.

Within Mexico, the Spanish and Mexican colonization led to attack on Yaqui lands and sovereignty. Towards the end of the 19th century, the Yaqui people continued to fight a guerrilla war to hold strong against the Mexican government. The Mexican government forced thousands of Yaqui people to relocate to distant Mexican towns and took Yaqui children from their homes to place them in Mexican households to be raised as Mexicans. This led to Yaqui families migrating to what is now southern Arizona to escape the Mexican government during and after the Mexican

Revolution from 1910-1920. The refugees set up settlements at Barrio Libre and Pascua near Tucson, at Guadalupe and Scottsdale near Phoenix, and at Somerton in the western part of Arizona. In 1964, the Pascua Yaqui were awarded 202 acres of land, and in 1978 the Pascua Yaqui Tribe of Arizona became the last federally recognized tribe to secure their recognition before the modern Federal Acknowledgement Process with the Bureau of Indian Affairs was instated (Miller 2004; University of Arizona 2023). Today, the tribe has nine communities: the New Pascua Reservation, Old Pascua in Tucson, Barrio Libre in South Tucson, Guadalupe in metro-Phoenix, Penjamo in Scottsdale, High Town in Chandler, Coolidge, Eloy, and Marana in northwest Tucson (University of Arizona 2023).

Ancestors of the O'odham, Yaqui, and other communities once had settlements along the Santa Cruz River, including the area that is now Old Pascua. There is also documentation of several Yaqui communities within the vicinity of present-day Old Pascua throughout the late 19th to early 20th centuries. Additionally, Old Pascua is considered one of the original settlements for many of the Yaqui refugees who migrated north to escape persecution in Mexico during the late 19th and early 20th centuries. In 1921, A.M. Franklin donated 40 acres of land to the Yaqui, and through the efforts of the Yaqui leaders and local politicians, the land formally became Pascua Village. Since then, Old Pascua has remained an important and sacred religious location. The Pascua Cultural Plaza, which has continued to be a location for surrounding Yaquis to gather and hold Waehma ceremonies into present day is now listed on the National Register of Historic Places as a traditional cultural property. The Old Pascua Museum and Yaqui Culture Center is located directly east of the existing tower. The 400-square foot building was constructed in the 1926 and is listed on the National Register of Historic Places as the Antonio Matus House. The property was willed to the tribe when the owner died. Today, a majority of tribal members live in New Pascua, southwest of Tucson; however, approximately 500 members still live in Old Pascua. In 2022, President Joe Biden signed the Old Pascua Community Land Acquisition Act into law, allowing tribally owned lands to be taken into trust on behalf of the Pascua Yaqui Tribe in an effort to preserve the Tribe's cultural grounds and to develop economic opportunities for tribal members. The parent parcel for the proposed undertaking was included in the 31 acres of land to be transferred to the BIA to be put into trust for the Tribe (Backer 2023; Rico 2013; Yucupicio 2021).

LAND USE HISTORY

The APE for direct effects has been located in a residential area since the 1920s. It is located directly adjacent to the historic Antonio Matus House (NRHP # 91000900), which is currently a museum for the Pascua Yaqui Tribe. According to historic aerial photographs, the existing tower is located on the western edge of the Antonio Matus House parcel, extending into the eastern edge of a second residential parcel. There was once a residence located just west of the existing tower and proposed ground equipment area from at least 1956 until sometime between 1990 and 1996, when the western residential property appears to have been demolished. Between 1996 and 2020, the Antonio Matus property appears to have undergone several alterations to the original fence line, and additional outbuildings were constructed. The existing tower was constructed in 2020, and the current fence line alignment was constructed in 2021, pushing the property west into the original western property boundary. Today, the existing tower and proposed ground equipment area is located in a lightly graveled area just west of the Antonio Matus House.

CLASS I PREVIOUS RECORDS REVIEW

A Class I records search of cultural resource records within the APE for direct effects and the ½-mile APE for visual effects was conducted using the online Arizona's Cultural Resource Inventory (AZSITE) and consultation with Dr. Karl Hoerig, Tribal Historic Preservation Officer for the Pascua Yaqui Tribe. ECA also conducted research for historic properties in the area using the National Register of Historic Places (NRHP) website, applicable topographic maps, and historic aerials. Background research was used to determine if any identified archaeological sites, surveys, or historic properties were located within the APE for visual and/or direct effects. Eleven previously identified cultural resources and 46 previously conducted cultural resource surveys are located within the ½-mile APE for visual effects and are discussed in tables 4 and 5 below.

Table 4: Cultural Resources Identified Within the APEs

Resource Number	Resource Name	Resource Type	NRHP Eligibility	Visibility
37978 / 38052	Antonio Matus House and Property	Historic Property: Early 20 th century domestic dwelling	NRHP Listed (NRHP# 91000900)	Tower Visible and Located Within APE for Direct Effects
38236	Pascua Cultural Plaza	Historic Property: Early 20 th century Yoeme cultural center	NRHP Listed (NRHP# 04001032)	Tower Visible
AZ BB:5:123(ASM)	Oracle-Tucson Transmission Line	Archaeological site: 20 th century communications line	SHPO Determined Ineligible	Tower Visible
AZ BB:9:440(ASM)	N/A	Archaeological site: mid-20 th century reinforced concrete foundation slab (DMP power plant)	Recorder Recommended Ineligible; SHPO Has Not Evaluated	Tower Minimally Visible
AZ BB:13:110(ASM)	St. Mary's Dump	Archaeological site: 19 th -20 th century bottle and trash dump (St. Mary's Sanatorium)	SHPO Determined Individually Eligible	Tower Visible
AZ BB:13:425(ASM)	Stone Pipe Site	Archaeological site: Paleoindian period through Hohokam Classic period habitation	SHPO Determined Individually Eligible	Tower Visible
AZ BB:13:468(ASM)	Canal Site	Archaeological site: Hohokam canals and Historic canal foundation	SHPO Determined Individually Eligible	Tower Visible
AZ BB:13:86(ASM)	N/A	Archaeological site: Hohokam ceramic and lithic scatter	SHPO Determined Individually Eligible	Tower Visible
AZ BB:13:866(ASM)	Unknown	Unknown: Advanced ASM Newly Recorded Site- Final Form Not Yet Submitted	Not Evaluated	Tower Not Visible
AZ FF:9:17(ASM)	SR 80	Archaeological site: Historic US 80 alignment	SHPO Determined Individually Eligible	Tower Not Visible
N/A	Juan Bautista de Anza NHT	National Historic Trail: Juan Bautista de Anza Expedition Route	Listed as a National Historic Trail	Tower Visible

Table 5: Previously Conducted Cultural Resource Surveys Identified Within the APEs

Report #	Project Name	Author Organization	Within Direct Effects?
1955-3.ASM	Southern Pacific Pipeline Survey	Null	No
1979-38.ASM	Santa Cruz River Park Survey	ASM	No
1979-39.ASM	TG+E Northern Tucson Transmission Line Survey	ASM	No
1980-155.ASM	Santa Cruz/SW Interceptor Project	ASM	No
1982-207.ASM	Tucson-Apache 115 kV Transmission Line	CASA	No
1983-78.ASM	Low Income Housing, Ventura East of Central	ASM	No
1987-216.ASM	Santa Cruz River: St. Mary's to Speedway, Speedway to Grant, and Grant to Fort Lowell	IFAR	No
1988-189.ASM	Tucson-Grant Road	ARS	No
1990-77.ASM	ROBBINS BUTTE/BUCKEYE	ARS	No
1991-88.ASM	Archaeological Survey of Glenn-Fairview Main Replacement	DESARC	No
1991-91.ASM	Archaeological Survey of Fairview Avenue - Grant Road to 15th Avenue Widening	DESARC	No
1994-279.ASM	ORACLE-TUCSON 115 KV TRANSMISSION LINE	WCRM	No
1998-267.ASM	Miracle Manor Survey	DESARC	No
1999-587.ASM	PBNS Level 3 Fiber Optic Line	SWCASCT	No
2000-284.ASM	Moratorium Streets Survey	DESARC	No
2000-723.ASM	AT&T NexGen/Core Project Link 3 Class 3 Survey	WCRM	No
2001-244.ASM	Fire Station 4 Survey	DESARC	No
2003-896.ASM	Old Pascua Neighborhood Survey	DESARC	No
2004-1035.ASM	Sidewalk Program Survey	DESARC	No
2004-1851.ASM	Pascua Neighborhood Improvement Survey	DESARC	No
2004-679.ASM	AT&T NexGen/Core Project	WCRM	No
2005-358.ASM	Riverview Park Survey	DESARC	No
2005-446.ASM	Tucson-Apache 115-kV Transmission Line Project	TRANSCON	No
2005-49.ASM	CSD 4-Home Survey	DESARC	No
2005-790.ASM	Riverview Park Monitoring	DESARC	No
2005-829.ASM	El Rio Acres B2B Survey	DESARC	No
2005-848.ASM	Fairview Industrial Park Parcel	OPAC	No

Report #	Project Name	Author Organization	Within Direct Effects?
2006-712.ASM	Santa Cruz Interceptor Phase II and III	SWCATUS	No
2006-872.ASM	Jancinto Park Survey	DESARC	No
2006-938.ASM	Yaqui Survey	TIERRA	No
2007-168.ASM	Santa Cruz Interceptor Phases II & III	SWCATUS	No
2007-45.ASM	City of Tucson 06 58	SWCATUS	No
2007-547.ASM	Old Pasqua Neighborhood Survey	TIERRA	No
2007-62.ASM	ICM	DESARC	No
2008-60.ASM	RTA Bus Pullout #2	TIERRA	No
2009-107.ASM	COT 08-03 4 Bus Pullouts	SWCATUS	No
2009-21.ASM	15th and Fairview Survey	TIERRA	No
2010-180.ASM	COT 10-08 Grant Road and Oracle Intersection	SWCATUS	No
2010-375.ASM	Yaqui 2 Lots Survey - Calle Sur	TIERRA	No
2010-376.ASM	Yaqui 2 Lots Survey - Calle Adelanto	TIERRA	No
2010-56.ASM	Grant/Flowing Wells Survey	TIERRA	No
2013-171.ASM	TEP DMP-Tucson 138/46-KV Transmission Line	WEST	No
2014-154.ASM	COT 14-03 ADA Sidewalk Upgrades Archaeological Survey	SWCATUS	No
2014-323.ASM	Grant Road Survey from Oracle to Swan	WSA	No
2016-392.ASM	Grant Road UPRR Feasibility Study	SWCATUS	No
SHPO-2001-547	Request for Evaluation - Telecommunication Facilities - ROADWAY EXPRESS, 601 West Flores Street In	AZTLAN	No

General Land Office (GLO) maps were checked for historic properties in the area. The 1871 GLO Map shows no properties in the area (1871 GLO Map).

ASSESSMENT OF VISUAL EFFECTS

Antonio Matus House and Property (NRHP# 91000900): The proposed undertaking lies partially within the NRHP-listed *Antonio Matus House and Property* parent parcel and would be visible from the historic property. However, the viewshed would not be significantly altered since the proposed collocation would be placed on an already existing tower structure. Additionally, there

are several modern overhead utility corridors in all directions of the Property. Given the limited viewshed changes from adding antennas to the existing tower structure and the presence of existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting of the *Antonio Matus House and Property*. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

Pascua Cultural Plaza (NRHP# 04001032): The proposed undertaking would be visible from the NRHP-listed *Pascua Cultural Plaza*. However, the viewshed would not be significantly altered since the proposed collocation would be placed on an already existing tower structure. Additionally, the Plaza is currently an active construction zone, and there are several modern overhead utility corridors to the north and south of the Plaza. Given the limited viewshed changes from adding antennas to the existing tower structure and the presence of existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting of the *Pascua Cultural Plaza*. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:5:123(ASM): The proposed undertaking would be visible from archaeological site AZ BB:5:123(ASM). However, the Arizona SHPO has determined that the site is not eligible for listing in the NRHP.

AZ BB:9:440(ASM): The proposed undertaking would be minimally visible from archaeological site AZ BB:9:440(ASM). However, the site has not been formally recommended eligible for listing in the NRHP. Additionally, the site is located within a modernized power plant facility, the historic portion of the facility appears to have been altered significantly over time, and the surrounding area has undergone modern commercial and residential development with modern overhead utility corridors in all directions from the site. Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting of the archaeological site. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:110(ASM): The proposed undertaking would be minimally visible from archaeological site AZ BB:13:110(ASM) which has been previously determined by AZ SHPO to be NRHP-eligible. However, there is a modern overhead utility corridor with large transmission towers passing through the site as well as N Freeway and Interstate 10 passing through the site along its eastern half. The proposed tower would be over 2,000 feet away and would be far less visually intrusive than the existing transmission towers, freeway and interstate within the viewshed of AZ BB:13:110(ASM). Given the minimal visibility of the tower and the existing modern intrusions, it is ECA's opinion that the proposed undertaking would diminish the existing setting of the archaeological site. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:425(ASM): The proposed undertaking would be visible from archaeological site AZ BB:13:425(ASM) which has been previously determined by AZ SHPO to be NRHP-eligible. However, N Freeway and Interstate 10 intersect a majority of the site, and modern overhead utility corridors and light poles are visible in both directions. Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting of the archaeological site. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:468(ASM): The proposed undertaking would be minimally visible from archaeological site AZ BB:13:468(ASM) which has been previously determined by AZ SHPO to be NRHP-eligible. However, N Freeway and a modern utility corridor intersect the site as well as Interstate 10 running directly west of the site. Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting of the archaeological site. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:86(ASM): The proposed undertaking would be minimally visible from archaeological site AZ BB:13:86(ASM) which has been previously determined by AZ SHPO to be NRHP-eligible. However, a modern park, baseball field, and residences have been constructed within the

boundary of the site. Additionally, Interstate 10 is located to the northeast of the archaeological site, and modern overhead utility lines and light poles are scattered throughout the current viewshed. Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting of the archaeological site. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

AZ BB:13:866(ASM): The proposed undertaking would not be visible from archaeological site AZ BB:13:866(ASM). Additionally, the site has not been formally recommended eligible for listing in the NRHP as it is currently only recorded as an ASM newly Recorded Site in the AZSITE GIS, and the final site form has not been entered into the GIS. Therefore, it is our opinion that this resource would not be affected by the proposed undertaking.

AZ FF:9:17(ASM): The proposed undertaking would be minimally visible from archaeological site AZ FF:9:17(ASM) which has been previously determined by AZ SHPO to be NRHP-eligible. However, the historic route has been developed into a modern four lane highway and is surrounded by modern commercial development on either side of the road with modern overhead utilities and light poles within its viewshed. Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting of the archaeological site. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

Juan Bautista de Anza NHT: The proposed undertaking would be visible from portions of *Juan Bautista de Anza NHT*. However, the portion of the historic expedition route within the APE for visual effects runs along Interstate 10 with modern overhead utilities and light poles within its viewshed. Given the existing modern intrusions, it is ECA's opinion that the proposed undertaking would not diminish the existing setting of the portion National Historic Trail within the ½-mile APE. Therefore, it is our opinion that this resource would not be adversely affected by the proposed undertaking.

ASSESSMENT OF DIRECT EFFECTS

Field Conditions

The parent tract contains a graveled lot, the historic *Antonio Matus House* (now the Old Pascua Museum and Yaqui Culture Center) and associated museum outbuildings. The existing tower is located within a lightly graveled lot. The proposed generator/propane pad and equipment cabinet to be located directly west of the existing tower, and the proposed buried fiber route would extend in a generally southerly then easterly direction across the graveled lot, ending at an existing utility pole. The proposed power route would run in a southerly then easterly direction across the graveled lot to end at an existing power box adjacent to the Old Pascua Museum and Yaqui Culture Center building (option one) or end at an existing power box adjacent to the Culture Center Restroom building (option two). The existing tower location is generally flat with little to no slope.

Table 6: Surface Visibility within the APE for Direct Effects

Proposed Generator/Propane Pad and Proposed Equipment Cabinet	Proposed Fiber Route	Proposed Power Routes
80-100% due to light gravel coverage in some areas	80-100% due to light gravel coverage in some areas	80-100% due to light gravel coverage in some areas

Field Methods

The methodology for the Class III Cultural Resources Survey for this project was determined by the professional opinions and experience of our principal and staff archaeologists, applicable SHPO guidelines, and applicable tribal guidelines. The intensive field survey was performed by Shannon Lowman, MA, RPA, Principal Archaeologist, of ECA on May 16, 2023. Approximately one hour of field time was recorded for the Class III Cultural Resources Survey.

A pedestrian survey was conducted over the project site by visual inspection of exposed ground surfaces throughout the proposed ground equipment area, the proposed fiber route, proposed power routes, and all of the immediately adjacent areas. Visual inspections were conducted at approximately 15-foot (5-meter) intervals. No archaeological cultural resources were encountered.

***Antonio Matus House and Property* (NRHP# 91000900):** The proposed project area lies partially within the parent parcel of the *Antonio Matus House and Property*. However, the project area was previously disturbed during the construction of the existing telecommunications tower. Additionally, the project area was also likely disturbed during the modifications to the property over the years, including the recent installation of fencing on the property in 2021. Native Network, Inc. has also confirmed that none of the associated ground equipment or utilities would be mounted on the *Antonio Matus House*. During ECA’s intensive field survey, no artifacts or cultural features were identified within the project area. As a result, it is our opinion that this resource would not be directly adversely affected by the proposed undertaking.

SUMMARY

ECA has assessed the effects of the telecommunications facility on known historic properties.

Direct APE: A portion of the parent tract for the NRHP-listed *Antonio Matus House and Property* is located within the APE for direct effects. However, the project area has been previously disturbed, and no archaeological artifacts or cultural features were identified during ECA’s survey. Therefore, a finding of “No Adverse Effect” is recommended.

Visual APE: Eleven previously recorded cultural resources [*Antonio Matus House and Property*, *Pascua Cultural Plaza*, AZ BB:5:123(ASM), AZ BB:9:440(ASM), AZ BB:13:110(ASM), AZ BB:13:425(ASM), AZ BB:13:468(ASM), AZ BB:13:86(ASM), AZ BB:13:866(ASM), AZ FF:9:17(ASM), and *Juan Bautista de Anza NHT*] are present within the ½-mile visual APE. Two of these cultural resources have been listed in the NRHP, five of the cultural resources have been previously determined NRHP-eligible by AZ SHPO, one cultural resource has been previously determined ineligible, and the remaining three resources are unevaluated. ECA is of the opinion that the proposed undertaking would not diminish the existing viewshed of any of the cultural resources. Accordingly, a finding of “No Adverse Effect” is recommended.

RECOMMENDATIONS

During the literature review for this Class III Cultural Resources Survey, the NRHP listed *Antonio Matus House and Property* was identified in the APE for direct effects. During ECA's intensive field survey, ECA documented extensive previous disturbance within the APE for direct effects and no archaeological artifacts or cultural features were identified. Further, we do not believe that the proposed undertaking would diminish the existing setting from this historic property. Therefore, we recommend a finding of "No Adverse Effect" for the proposed undertaking and request your concurrence with our finding. If inadvertent discoveries of buried cultural materials or human remains are found during construction, all work should cease and potentially affected Tribes, as well as the State Historic Preservation Office should be notified immediately.

CLOSURE

We are submitting this report for the Pascua Yaqui Tribe to seek concurrence with our finding and to comply with NTIA requirements under the National Historic Preservation Act. Shannon Lowman, MA, RPA, performed the fieldwork and authored the report. Matt Beazley, MA, RPA, Principal Investigator, reviewed this assessment. Resumes of these key personnel can be provided upon request. We request your concurrence with our finding. Please contact our office with questions or comments or if additional information is required.

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Wilcox, David R., and W. Bruce Masse (editors)

1981 *The Protohistoric Period in the North American Southwest, A.D. 1450–1700*.

Anthropological Research Papers No. 24. Arizona State University, Tempe.

Yucupicio, Peter

2021 Hearing on H.R. 4881 *The Old Pascua Community Land Acquisition Act*, Written Testimony of Peter Yucupicio, Chairman, Pascua Yaqui Tribe, Tucson, Arizona, October 5, 2021, 12:00 pm EDT. U.S. House of Representatives Committee on Natural Resources Subcommittee for Indigenous Peoples of the United States 1324 Longworth House Office Building Washington, D.C.

Zyniecki, Mark

1996 *The Chronology of the Polvorón Phase*. In *The Sky Harbor Project. Early Desert Farming and Irrigation Systems: Archaeological Investigations in the Phoenix Sky Harbor Center, Volume 4: Special Studies, Synthesis, and Conclusions*, edited by David H. Greenwald and Jean H. Ballagh, pp. 141–148. *Anthropological Research Paper No. 4*. SWCA Environmental Consultants, Flagstaff

Tribal Consultation

Coolidge Tower Site

Environmental Corporation of America (ECA)

TRIBAL INVOLVEMENT SUMMARY

Site Name:		Coolidge	Site Number:		NA	NOO Date:		8/4/2023
TCNS #:		269917	ECA Project#:		23-001191	ECA PM:		SAL
NOO #	Tribal Entity Name	Date of Document Submittal	Method of Delivery	Email Address	Date of Escalation	Tribal Response Date	Tribal Response	
1	Pueblo of Zuni	8/4/2023	Electronic and Mail	kdongoske@gmail.com ; cdongoske@cableone.net	9/13/2023	9/28/2023	Cleared via Escalation	
2	Apache Tribe of Oklahoma	8/4/2023	Electronic	Apacheculture510@yahoo.com	9/13/2023	9/28/2023	Cleared via Escalation	
3	Eastern Shoshone Tribe	8/4/2023	Electronic (Website)	http://www.esthpo.com	9/14/2023	9/29/2023	Cleared via Escalation	
4	Tohono O'odham Nation	8/4/2023	Electronic	psteere@touna.net ; peter.steere@tonation-nsn.gov	NA	8/4/2023	Cleared via Email	
5	Ak Chin Indian Community Council	8/4/2023	Electronic	cnarcia@ak-chin.nsn.us ; EPeters@ak-chin.nsn.us	NA	8/30/2023	Cleared via TCNS	
6	Gila River Indian Community	8/4/2023	Electronic and Mail	Catherine.Thomas@gric.nsn.us ; Larry.BenallieJr@gric.nsn.us ; Barnaby.Lewis@gric.nsn.us ; Kyle.Woodson@gric.nsn.us	NA	8/7/2023	Cleared via Email	
7	Fort McDowell Yavapai Tribe	8/4/2023	Electronic	gloutzenheiser@ftmcdowell.org ; emccalvin@fmyrn.org	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
8	Pascua Yaqui Tribe	7/13/2023	Electronic	khoerig@pascuayaqui-nsn.gov	NA	9/15/2023	Cleared via Letter	
9	Tonto Apache Tribal Council	8/4/2023	Electronic	idecola@tontoapache.org	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
10	Yavapai-Prescott Indian Tribe	8/4/2023	Electronic	gglassco@ypit.com	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
11	Kaibab Band of Paiute Indians	8/4/2023	Electronic and Mail	dbullets@kaibabpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
12	San Juan Southern Paiute Tribe	8/4/2023	Electronic	k.barlow@sanjuanpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
13	Skull Valley Band of Goshute	8/4/2023	Electronic and Mail	candaceb@svgoshutes.com	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
14	Mescalero Apache Tribe	8/4/2023	Electronic	holly@mathpo.org	9/13/2023	9/28/2023	Cleared via Escalation	
15	White Mountain Apache Tribe	8/4/2023	Electronic and Mail	markaltaha@wmat.us	9/13/2023	9/28/2023	Cleared via Escalation	
16	Hopi Cultural Preservation Office	8/4/2023	Electronic and Mail	tmorgart@hopi.nsn.us ; SKoviyumptewa@hopi.nsn.us ; jmaase@hopi.nsn.us	NA	8/14/2023	Cleared via TCNS	
17	Yavapai-Apache Community Council	8/4/2023	Electronic and Mail	ccoder@yan-tribe.org	9/13/2023	9/28/2023	Cleared via Escalation	
18	Salt River Pima-Maricopa Indian Community	8/4/2023	Electronic	angela.garcia-lewis@srpmic-nsn.gov ; shane.anton@srpmic-nsn.gov	9/13/2023	9/28/2023	Cleared via Escalation	

*30-Day Response Agreement Language: "If the applicant/tower builder receives no response from the Tribe within 30 days after notification through TCNS, the Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law."

Shannon Lowman

From: Fitzpatrick, Joshua <jfitzpatrick@ntia.gov>
Sent: Wednesday, September 13, 2023 3:33 PM
Subject: Tower Construction Notification System (TCNS) Follow Up: Pascua Yaqui Broadband Internet Coolidge Tower Construction
Attachments: Coolidge_Section 106 Survey_ECA_23-001191.pdf; Coolidge Tower Project Description.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Greetings,

Per below, your office was previously contacted via the FCC's Tower Construction Notification System (TCNS) regarding the request for review under Section 106 of the National Historic Preservation Act for the Pascua Yaqui Tribal Broadband Connectivity Project located in and near the Pascua Yaqui Reservation in Arizona. The National Telecommunications and Information Administration (NTIA) is funding the proposed construction of a 75-foot tall (overall height) monopole telecommunications structure and associated ground equipment within a proposed approximate 40-foot by 40-foot (12-meter by 12-meter) fenced tower compound. The project would also include a proposed approximate 130-foot long (40-meter) buried fiber route in Coolidge, AZ on private property. For further details on the project description, maps and archeological survey completed, please see the attached.

This proposed project has been referred back to the NTIA for a final request for comment of this proposed broadband deployment. Please do not hesitate to contact me if you have any questions or concerns on this proposed project by September 27, 2023.

Thank you,

Josh Fitzpatrick
Environmental Program Officer
National Telecommunications and Information Administration
Office of Internet Connectivity and Growth
Email: jfitzpatrick@ntia.gov
Phone: 202.834.3123

From: towernotifyinfo@fcc.gov
Sent: Friday, August 4, 2023 3:13 AM
To: tribal.notify
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #8628175

Dear Applicant:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the notification that you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter). We note that the review period for all parties begins upon receipt of the Submission Packet pursuant to Section VII.A of the NPA and notifications that do not provide this serve as information only.

Persons who have received the notification that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribal Nations"), Native Hawaiian Organizations

(NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribal Nations and NHOs and in making further contacts, the City and State of the Seat of Government for each Tribal Nation and NHO, as well as the designated contact person, is included in the listing below. We note that Tribal Nations may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribal Nations and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribal Nation or NHO. (NPA, Section IV.F.4).

The notification that you provided was forwarded to the following Tribal Nations and NHOs. A Tribal Nation or NHO may not respond until a full Submission Packet is provided. If, upon receipt, the Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a followup inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. Projects Manager Cindy K Dongoske - Pueblo of Zuni - (PO Box: 1149) Zuni, NM - cdongoske@cableone.net - 505-782-4814 - regular mail

2. Darrin Cisco - Apache Tribe of Oklahoma - 510 E Colorado Drive (PO Box: 1330) Anadarko, OK - Apacheculture510@yahoo.com - 405-247-7494 (ext: 103) - electronic mail

2

3. THPO Josh Mann - Eastern Shoshone Tribe - (PO Box: 538) Fort Washakie, WY - jmann@easternshoshone.org - 307-335-2081 - electronic mail

Exclusions: Thank you for the recent submittal regarding your TCNS project. Based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC Programmatic Agreement as Traditionally Associated

Peoples (TAPs) and a sovereign nation legal responsibility for heritage preservation on ancestral homelands. Please utilize our ESTHPO website for online

submittals. Our website address is: <http://www.esthpo.com>. Please navigate to our Services page. On the services page there will be a Submittal button

under the Section 106 Consultation literature. The submittal button will navigate you to the upload page where can submit relevant project files for our consultation review.

Your submission should include:

Appropriate SHPO determination or response letter

Cultural Resource Report and or Archaeological Survey Report

Photographic project site documentation

Topographic or Quadrangle Maps

Site Plans/Construction Drawings

FCC Forms 620 and 621

Lat/Long Coordinates for the proposed project.

Project Coordinator Contact Information

Our 30-day review period will commence once all project details have been submitted into our online database. If you have any questions, please feel free to

contact the Eastern Shoshone THPO: Joshua Mann, jmann@easternshoshone.org or by phone at: (307) 335-2081 or Shaylynn Durgin,

sdurgin@easternshoshone.org or by phone at: (307) 335-2081. Thank you for consulting with the Eastern Shoshone Tribe.

The ancestors of the Eastern Shoshone Tribe lived a long and storied history across several states on their westward journey from the Western area to present-day Wyoming. This journey, confirmed by tribal oral history, ethnographies, and archaeological evidence, took place over multiple generations and through the present-day states of North Dakota,

South Dakota, Nebraska, Kansas, Colorado, Wyoming, Montana, Idaho, Washington, Oregon, California, Utah, Nevada, Arizona, New Mexico and Texas. Significant historical resources throughout this region include major sacred sites including burial sites, occupation areas, medicinal plant and resource collection areas, and other significant traditional cultural properties (TCPs). Therefore, based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this proposed project and are requesting to be consulted on this proposed project as required by the

3 mandates expressed in 36 CFR 800, EO 13175, and the FCC National Programmatic Agreement as traditionally associated peoples (TAPs) and a sovereign nation with legal responsibility for heritage preservation on ancestral homelands.

4. THPO Peter Steere - Tohono O'odham Nation - (PO Box: 837) Sells, AZ - psteere@toua.net - 520-383-0202 - electronic mail

5. Cultural Resources Representative Carmen E Narcia - Ak Chin Indian Community Council - 42507 W. Peters & Nall Road Maricopa, AZ - cnarcia@ak-chin.nsn.us; EPeters@ak-chin.nsn.us - 520-568-1365 - electronic mail

6. THPO Larry Benallie Jr - Gila River Indian Community - (PO Box: 2140) Sacaton, AZ - Catherine.Thomas@gric.nsn.us - 520-562-7162 - electronic mail and regular mail

7. Cultural Representative Gary L Loutzenheiser - Fort McDowell Yavapai Tribe - (PO Box: 17779) Fountain Hills, AZ - gloutzenheiser@ftmcdowell.org - 480-789-7000 - electronic mail

If the applicant/tower builder receives no response from the Fort McDowell Yavapai Tribe within 30 days after notification through TCNS, the Fort McDowell Yavapai Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Fort McDowell Yavapai Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

8. Tribal Planner Artemio Hoyos - Pascua Yaqui Tribe - 7474 S. Camino de Oeste Tucson, AZ - Artemio.Hoyos@pascua yaqui-nsn.gov - 520-879-6337 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Pascua Yaqui Tribe within 30 days after notification through TCNS, the Pascua Yaqui Tribe has no interest in participating in pre-construction review for the proposed site.

The Applicant/tower builder,

however, must immediately notify the Pascua Yaqui Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

9. NAGPRA Representative Jeri DeCola - Tonto Apache Tribal Council - Tonto Reservation #30 Payson, AZ - jdecola@tontoapache.org - 928-474-5000 - electronic mail

4

If the applicant/tower builder receives no response from the Tonto Apache Tribal Council within 30 days after notification through TCNS, the Tonto Apache Tribal Council has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Tonto Apache Tribal Council in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

10. Compliance Officer Greg Glassco - Yavapai-Prescott Indian Tribe - 530 E. Merritt Prescott, AZ - gglassco@ypit.com - 928-777-9435 - electronic mail

If the applicant/tower builder receives no response from the Yavapai-Prescott Indian Tribe within 30 days after notification through TCNS, the Yavapai-Prescott Indian Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Yavapai-Prescott Indian Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

11. Environmental Program Director Daniel Bullets - Kaibab Band of Paiute Indians - HC65, Box 02 Fredonia, AZ - dbullets@kaibabpaiute-nsn.gov - 928-643-7245 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Kaibab Band of Paiute Indians within 30 days after notification through TCNS, the Kaibab Band of Paiute Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Kaibab Band of Paiute Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

12. Tribal Administrator Jack Conovaloff - San Juan Southern Paiute Tribe - Administrative Office (PO Box: 2950) Tuba City, AZ - j.conovaloff@sanjuanpaiute-nsn.gov - 928-707-5075 - electronic mail

If the applicant/tower builder receives no response from the San Juan Southern Paiute Tribe within 30 days after notification through TCNS, the San Juan Southern Paiute Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the San Juan Southern Paiute Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

13. Chairman Candace Bear - Skull Valley Band Goshute - 407 Skull Valley Rd Skull Valley, UT - candaceb@svgoshutes.com; candaceb@svgoshutes.com - 435-882-4532 - electronic mail and regular mail

5

Exclusions: Montana And Associates LLC does not contract for Skull Valley Band of Goshute any longer. Thank you.

If the applicant/tower builder receives no response from the Skull Valley Band Goshute within 30 days after notification through TCNS, the Skull Valley Band Goshute has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

however, must immediately notify the Skull Valley Band Goshute in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

14. Tribal Historic Preservation Officer Holly B Houghten - Mescalero Apache Tribe - Mescalero Apache Tribal Historic Preservation Office 101 Central Ave (PO Box: 227) Mescalero, NM - holly@mathpo.org - 575-464-3005 - electronic mail

15. THPO Mark Altaha - White Mountain Apache Tribe - P.O. Box 1032 Fort Apache, AZ - markaltaha@wmat.us - 928-338-3033 - electronic mail and regular mail

Exclusions: The White Mountain Apache Tribe Historic Preservation Office (THPO) is working remotely due to the coronavirus pandemic. This may cause delay in responding to Section 106 consultation for FCC TCNS Projects.

Mark Altaha - THPO

White Mountain Apache Tribe

Historic Preservation Office

Fort Apache, Arizona

The notification that you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA unless the project is excluded from SHPO review under Section III D or E of the NPA.

16. Cultural Resources Compliance Manager Mary-Ellen Walsh - Arizona State Historic Preservation Office - 1100 W Washington Street Phoenix, AZ - azshpo@azstateparks.gov - 602-542-4009 - electronic mail

17. SHPO Kathryn Leonard - Arizona State Parks - 1300 West Washington Phoenix, AZ - jroth@azstateparks.gov - 602-542-4009 - electronic mail

6

TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal for PTC wayside poles falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. In addition, a particular Tribal Nation or SHPO may also set forth policies or procedures within its details box that exclude from review certain facilities (for example, a statement that it does not review collocations with no ground disturbance; or that indicates that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above have opened and reviewed an electronic or regular mail notification. If you learn that any of the above contact information is no longer valid, please contact the FCC by emailing tcnshelp@fcc.gov. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 07/28/2023

Notification ID: 269917

Excluded from SHPO Review: No

Tower Owner Individual or Entity Name: Pascua Yaqui Tribe

Consultant Name: Dina M Bazzill

Street Address: 1375 Union Hill Industrial Court

Suite A

City: Alpharetta

State: GEORGIA

Zip Code: 30004

Phone: 770-667-2040

Email: tribal.notify@eca-usa.com

Structure Type: MTOWER - Monopole

Latitude: 32 deg 58 min 38.2 sec N

Longitude: 111 deg 31 min 14.4 sec W

Location Description: 341 W Central Avenue

City: Coolidge

State: ARIZONA

County: PINAL

Detailed Description of Project: 23-001191: NTIA funded- Proposed 75-foot Overall Height Monopole

Telecommunications Structure

Ground Elevation: 435.6 meters

Support Structure: 22.9 meters above ground level

Overall Structure: 22.9 meters above ground level

Overall Height AMSL: 458.5 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic Help Request form located on the FCC's website at:

<https://www.fcc.gov/wireless/available-support-services>

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8:00 a.m. to 6:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,

Federal Communications Commission

7

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Shannon Lowman

From: Peter Steere <Peter.Steere@tonation-nsn.gov>
Sent: Friday, August 4, 2023 2:01 PM
To: Shannon Lowman
Subject: RE: TCNS 269917 Section 106 Review

Follow Up Flag: Follow up
Flag Status: Flagged

Shannon Lowman
ECA

No issues or concerns on 269917 cell tower site

Peter L. Steere
THPO
Tohono O'odham Nation

From: Shannon Lowman [mailto:shannon.lowman@eca-usa.com]
Sent: Friday, August 4, 2023 8:16 AM
To: psteere@toa.net
Cc: Peter Steere <Peter.Steere@tonation-nsn.gov>
Subject: TCNS 269917 Section 106 Review

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Tohono O'odham Nation through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID # 269917
Class III Cultural Resources Survey for a Proposed 75-Foot Tall Monopole Telecommunications Structure, Coolidge, Pinal County, AZ
NTIA Grant No. NT22TBC0290057
ECA Project # 23-001191

We look forward to your response.

Thank you,

Shannon Lowman, MA, RPA
Principal Archaeologist
Environmental Corporation of America (ECA)
1375 Union Hill Industrial Court
Alpharetta, GA 30004
770-667-2040 x. 118 (office)
770-667-2041 (fax)
404-345-2301 (cell)
shannon.lowman@eca-usa.com

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Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Wednesday, August 30, 2023 4:55 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; cnarcia@ak-chin.nsn.us; EPeters@ak-chin.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269917) - Email ID #8657614

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Cultural Resources Representative Carmen E Narcia of the Ak Chin Indian Community Council in reference to Notification ID #269917:

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269917
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: MTOWER - Monopole
Latitude: 32 deg 58 min 38.2 sec N
Longitude: 111 deg 31 min 14.4 sec W
Location Description: 341 W Central Avenue
City: Coolidge
State: ARIZONA
County: PINAL

Detailed Description of Project: 23-001191: NTIA funded- Proposed 75-foot Overall Height Monopole
Telecommunications Structure
Ground Elevation: 435.6 meters
Support Structure: 22.9 meters above ground level
Overall Structure: 22.9 meters above ground level
Overall Height AMSL: 458.5 meters above mean sea level

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Shannon Lowman

From: Larry Benallie Jr <Larry.BenallieJr@gric.nsn.us>
Sent: Monday, August 7, 2023 4:53 PM
To: Shannon Lowman
Cc: Caroline Klebacha; Catherine Thomas
Subject: TCNS 269917

In Response to [TCNS# 269917](#), Native Network, Inc. Tower, 341 W. Central Avenue, Coolidge, Pinal County, Arizona.

Thank you for the information you have provided to the Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO). The GRIC-THPO identifies no religious or culturally significant sites within the project area. The GRIC-THPO concurs that the project will have no adverse effect on historic properties listed or eligible for listing on the National Register. Thank you for consulting with the Gila River Indian Community on this proposed project.

Respectfully,

Larry Benallie, Jr.

Archaeological Compliance Specialist
Tribal Historic Preservation Office
Gila River Indian Community
P.O. Box 2193
Sacaton, Arizona 85147
(520) 562-7153
Larry.BenallieJr@gric.nsn.us

[Government to Government Consultation Toolkit](#)

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PASCUA YAQUI TRIBE

DEPARTMENT OF LANGUAGE AND CULTURE ITOM HIAK LUTU'URIA YO'ORIWA INTO NAKWA



September 15, 2023

Shannon Lowman, MA, RPA
Principal Archaeologist/Assistant Tribal Coordinator
Environmental Corporation of America
1375 Union Hill Industrial Court
Alpharetta, GA 30004

Dear Ms. Lowman,

I am writing in response to your request for consultation regarding the planned installation of communications fiber and towers in various Pascua Yaqui communities in Arizona.

23-001205: Guadalupe

The Pascua Yaqui Tribal Historic Preservation Office (PYTHPO) concurs with the determination of “no adverse effect” to historic properties for the collocation of broadband devices on the building located at 9405 S. Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona.

23-001191: Coolidge

PYTHPO concurs with the determination of “no adverse effect” to historic properties for the construction of a communications tower and associated fixtures in Coolidge, Pinal County, Arizona.

23-001200: Marana

PYTHPO concurs with the determination of “no adverse effect” to historic properties for the construction of a communications monopole tower and associated fixtures on Pascua Yaqui Tribal fee land at Yoem Pueblo, Marana, Pima County, Arizona.

23-001190: Milagros (Barrio Libre)

PYTHPO concurs with the determination of “no adverse effect” to historic properties for the construction of a communications monopole tower and associated fixtures, including the installation of a 100 foot long buried fiber route, with the following conditions: The project site is within the boundaries of NRHP-eligible archaeological site AZ BB:13:17 (ASM) and is within the City of Tucson’s Julian Wash Archaeological Sensitivity Zone. All initial ground disturbance for this project should be monitored by a qualified archaeologist. PYTHPO will provide monitoring for work completed on the Tribe’s fee lands. Ground disturbance that occurs in the City of Tucson ROW must be monitored by a city-approved archaeological monitor. Per Tohono O’Odham Nation request, excavation for the fiber line should be completed by use of a back hoe rather than a trencher to facilitate identification of any subsurface cultural materials that might be present.

Hiak Noki
Language Program

Itom Sauwa'u
Traditional Arts Program

Hiak Etehori, Hiak Lutu'uria
History and Culture Program

Veeme Ya'uchia
Miss Pascua Yaqui Program

5100 W. Calle Tetakusim • Tucson, Arizona 85757 • Phone (520) 879-5939 • FAX (520) 879-5747
E-mail: LanguageAndCulture@pascuayaqui-nsn.gov

23-001365: Tortuga Ranch to New Pascua Pueblo

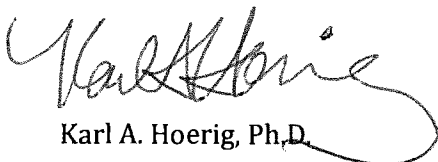
PYTHPO concurs with the determination of “no adverse effect” to historic properties for the installation of buried and aerial fiber between the Tribe’s Tortuga Ranch and locations on the Tribe’s reservation and trust lands at New Pascua Pueblo with the following conditions: Contractors will consult with PYTHPO to flag for avoidance any remaining unexcavated/mitigated portions of AZ AA:16:440(ASM) and the stone ring identified as IF 3 in the “Yaqui Square” development area on the Tribe’s reservation and trust lands. Should an any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

23-001203: Old Pascua Village

This project will be undertaken on lands that are in the process of conversion from Pascua Yaqui Tribe fee lands to Trust lands, and as such will be subject to review by the PYTHPO. The APE includes a portion of the National Register-listed Antonio Matus House and Property and the entirety of the APE is located within the City of Tucson Stone Pipe Archaeological Sensitivity Zone. Because the communications tower is an existing facility, this project should meet the standard of “no adverse effect” to historic properties. Project contractors must take care to avoid any ground disturbance or other activities what would cause adverse effect to the historic house, including any changes to precipitation runoff patterns that would increase moisture near the house. No trenching should be undertaken adjacent to the historic house. If any ground disturbance will occur within the City of Tucson ROW, an outside archaeological monitor must be utilized to meet City requirements in the Archaeological Sensitivity Zone. Should any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

If you have any additional questions or concerns about these projects, or require any additional review by our office, please contact me at (520) 883-5116 or karl.hoerig@pascuayaqui-nsn.gov.

With warmest regards,



Karl A. Hoerig, Ph.D.

Pascua Yaqui Tribal Historic Preservation Officer

Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Monday, August 14, 2023 8:11 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; jmaase@hopi.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269917) - Email ID #8641165

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Archeologist Jakob Maase of the Hopi Cultural Preservation Office in reference to Notification ID #269917:

The Hopi Tribe has reviewed this report and finds its findings of no "adverse effect" adequate.

Thank you.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269917
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: MTOWER - Monopole
Latitude: 32 deg 58 min 38.2 sec N
Longitude: 111 deg 31 min 14.4 sec W
Location Description: 341 W Central Avenue
City: Coolidge
State: ARIZONA
County: PINAL

Detailed Description of Project: 23-001191: NTIA funded- Proposed 75-foot Overall Height Monopole
Telecommunications Structure
Ground Elevation: 435.6 meters
Support Structure: 22.9 meters above ground level
Overall Structure: 22.9 meters above ground level
Overall Height AMSL: 458.5 meters above mean sea level

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Guadalupe Tower Site

Environmental Corporation of America (ECA)

TRIBAL INVOLVEMENT SUMMARY

Site Name:		Guadalupe	Site Number:		NA	NOO Date:		8/4/2023
TCNS #:		269922	ECA Project#:		23-001205	ECA PM:		SAL
NOO #	Tribal Entity Name	Date of Document Submittal	Method of Delivery	Email Address	Date of Escalation	Tribal Response Date	Tribal Response	
1	Pueblo of Zuni	8/4/2023	Electronic and Mail	kdongoske@gmail.com ; cdongoske@cableone.net	NA	NA	NA	
2	Apache Tribe of Oklahoma	8/4/2023	Electronic	Apacheculture510@yahoo.com	NA	NA	NA	
3	Eastern Shoshone Tribe	8/4/2023	Electronic (Website)	http://www.esthpo.com	NA	NA	NA	
4	Ak Chin Indian Community Council	8/4/2023	Electronic	cnarcia@ak-chin.nsn.us ; EPeters@ak-chin.nsn.us	NA	8/30/2023	Cleared via TCNS	
5	Gila River Indian Community	8/4/2023	Electronic and Mail	Catherine.Thomas@gric.nsn.us ; Larry.BenallieJr@gric.nsn.us ; Barnaby.Lewis@gric.nsn.us ; Kyle.Woodson@gric.nsn.us	NA	8/7/2023	Cleared via Email	
6	Fort McDowell Yavapai Tribe	8/4/2023	Electronic	gloutzenheiser@ftmcdowell.org ; emccalvin@fmyrn.org	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
7	Pascua Yaqui Tribe	7/13/2023	Electronic	khoerig@pascuayaqui-nsn.gov	NA	9/15/2023	Cleared via Letter	
8	Salt River Pima-Maricopa Indian Community	8/4/2023	Electronic	angela.garcia-lewis@srpmic-nsn.gov ; shane.anton@srpmic-nsn.gov	NA	NA	NA	
9	Tonto Apache Tribal Council	8/4/2023	Electronic	idecola@tontoapache.org	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
10	Yavapai-Prescott Indian Tribe	8/4/2023	Electronic	gglassco@ypit.com	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
11	Kaibab Band of Paiute Indians	8/4/2023	Electronic and Mail	dbullets@kaibabpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
12	San Juan Southern Paiute Tribe	8/4/2023	Electronic	k.barlow@sanjuanpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
13	Skull Valley Band of Goshute	8/4/2023	Electronic and Mail	candaceb@svqoshutes.com	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
14	Mescalero Apache Tribe	8/4/2023	Electronic	holly@mathpo.org	NA	NA	NA	
15	White Mountain Apache Tribe	8/4/2023	Electronic and Mail	markaltaha@wmat.us	NA	NA	NA	
16	Fort Mojave Indian Tribe	8/4/2023	Electronic and Mail	lindaotero@fortmojave.com	NA	NA	NA	
17	Hopi Cultural Preservation Office	8/4/2023	Electronic and Mail	tmorgart@hopi.nsn.us ; SKoviyumptewa@hopi.nsn.us ; jmaase@hopi.nsn.us	NA	8/14/2023	Cleared via TCNS	
18	Yavapai-Apache Community Council	8/4/2023	Electronic and Mail	ccoder@yan-tribe.org	NA	NA	NA	
19	Tohono O'odham Nation	8/4/2023	Electronic	psteere@touna.net ; peter.steere@tonation-nsn.gov	NA	8/4/2023	Cleared via Email	

*30-Day Response Agreement Language: "If the applicant/tower builder receives no response from the Tribe within 30 days after notification through TCNS, the Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law."

Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Wednesday, August 30, 2023 4:55 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; cnarcia@ak-chin.nsn.us; EPeters@ak-chin.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269922) - Email ID #8657611

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Cultural Resources Representative Carmen E Narcia of the Ak Chin Indian Community Council in reference to Notification ID #269922:

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269922
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: BPOLE - Building with Pole
Latitude: 33 deg 21 min 38.5 sec N
Longitude: 111 deg 57 min 42.9 sec W
Location Description: 9405 S Avenida Del Yaqui
City: Guadalupe
State: ARIZONA
County: MARICOPA

Detailed Description of Project: 23-001205: NTIA funded- Proposed Collocation of Antennas

Ground Elevation: 380.4 meters

Support Structure: 9.1 meters above ground level

Overall Structure: 15.2 meters above ground level

Overall Height AMSL: 395.6 meters above mean sea level

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Shannon Lowman

From: Larry Benallie Jr <Larry.BenallieJr@gric.nsn.us>
Sent: Monday, August 7, 2023 4:42 PM
To: Shannon Lowman
Cc: Caroline Klebacha; Karl Hoerig; Barnaby Lewis; Catherine Thomas
Subject: TCNS 269922

In Response to [TCNS# 269922](#), Native Networks Inc. Collocation, 9405 S. Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona.

Thank you for the information you have provided to the Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO). The GRIC-THPO identifies no religious or culturally significant sites within the project area. The GRIC-THPO concurs that the project will have no adverse effect on historic properties listed or eligible for listing on the National Register. Thank you for consulting with the Gila River Indian Community on this proposed project.

Respectfully,

Larry Benallie, Jr.

Archaeological Compliance Specialist
Tribal Historic Preservation Office
Gila River Indian Community
P.O. Box 2193
Sacaton, Arizona 85147
(520) 562-7153
Larry.BenallieJr@gric.nsn.us

[Government to Government Consultation Toolkit](#)

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PASCUA YAQUI TRIBE

DEPARTMENT OF LANGUAGE AND CULTURE ITOM HIAK LUTU'URIA YO'ORIWA INTO NAKWA



September 15, 2023

Shannon Lowman, MA, RPA
Principal Archaeologist/Assistant Tribal Coordinator
Environmental Corporation of America
1375 Union Hill Industrial Court
Alpharetta, GA 30004

Dear Ms. Lowman,

I am writing in response to your request for consultation regarding the planned installation of communications fiber and towers in various Pascua Yaqui communities in Arizona.

23-001205: Guadalupe

The Pascua Yaqui Tribal Historic Preservation Office (PYTHPO) concurs with the determination of "no adverse effect" to historic properties for the collocation of broadband devices on the building located at 9405 S. Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona.

23-001191: Coolidge

PYTHPO concurs with the determination of "no adverse effect" to historic properties for the construction of a communications tower and associated fixtures in Coolidge, Pinal County, Arizona.

23-001200: Marana

PYTHPO concurs with the determination of "no adverse effect" to historic properties for the construction of a communications monopole tower and associated fixtures on Pascua Yaqui Tribal fee land at Yoem Pueblo, Marana, Pima County, Arizona.

23-001190: Milagros (Barrio Libre)

PYTHPO concurs with the determination of "no adverse effect" to historic properties for the construction of a communications monopole tower and associated fixtures, including the installation of a 100 foot long buried fiber route, with the following conditions: The project site is within the boundaries of NRHP-eligible archaeological site AZ BB:13:17 (ASM) and is within the City of Tucson's Julian Wash Archaeological Sensitivity Zone. All initial ground disturbance for this project should be monitored by a qualified archaeologist. PYTHPO will provide monitoring for work completed on the Tribe's fee lands. Ground disturbance that occurs in the City of Tucson ROW must be monitored by a city-approved archaeological monitor. Per Tohono O'Odham Nation request, excavation for the fiber line should be completed by use of a back hoe rather than a trencher to facilitate identification of any subsurface cultural materials that might be present.

Hiak Noki
Language Program

Itom Sauwa'u
Traditional Arts Program

Hiak Etehori, Hiak Lutu'uria
History and Culture Program

Veeme Ya'uchia
Miss Pascua Yaqui Program

5100 W. Calle Tetakusim • Tucson, Arizona 85757 • Phone (520) 879-5939 • FAX (520) 879-5747
E-mail: LanguageAndCulture@pascuayaqui-nsn.gov

23-001365: Tortuga Ranch to New Pascua Pueblo

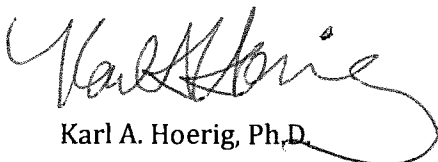
PYTHPO concurs with the determination of “no adverse effect” to historic properties for the installation of buried and aerial fiber between the Tribe’s Tortuga Ranch and locations on the Tribe’s reservation and trust lands at New Pascua Pueblo with the following conditions: Contractors will consult with PYTHPO to flag for avoidance any remaining unexcavated/mitigated portions of AZ AA:16:440(ASM) and the stone ring identified as IF 3 in the “Yaqui Square” development area on the Tribe’s reservation and trust lands. Should an any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

23-001203: Old Pascua Village

This project will be undertaken on lands that are in the process of conversion from Pascua Yaqui Tribe fee lands to Trust lands, and as such will be subject to review by the PYTHPO. The APE includes a portion of the National Register-listed Antonio Matus House and Property and the entirety of the APE is located within the City of Tucson Stone Pipe Archaeological Sensitivity Zone. Because the communications tower is an existing facility, this project should meet the standard of “no adverse effect” to historic properties. Project contractors must take care to avoid any ground disturbance or other activities what would cause adverse effect to the historic house, including any changes to precipitation runoff patterns that would increase moisture near the house. No trenching should be undertaken adjacent to the historic house. If any ground disturbance will occur within the City of Tucson ROW, an outside archaeological monitor must be utilized to meet City requirements in the Archaeological Sensitivity Zone. Should any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

If you have any additional questions or concerns about these projects, or require any additional review by our office, please contact me at (520) 883-5116 or karl.hoerig@pascuayaqui-nsn.gov.

With warmest regards,



Karl A. Hoerig, Ph.D.

Pascua Yaqui Tribal Historic Preservation Officer

Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Monday, August 14, 2023 8:15 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; jmaase@hopi.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269922) - Email ID #8641167

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Archeologist Jakob Maase of the Hopi Cultural Preservation Office in reference to Notification ID #269922:

The Hopi Tribe has reviewed this report and concurs with its findings of no "adverse effect."

Thank you.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269922
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: BPOLE - Building with Pole
Latitude: 33 deg 21 min 38.5 sec N
Longitude: 111 deg 57 min 42.9 sec W
Location Description: 9405 S Avenida Del Yaqui
City: Guadalupe
State: ARIZONA
County: MARICOPA

Detailed Description of Project: 23-001205: NTIA funded- Proposed Collocation of Antennas

Ground Elevation: 380.4 meters

Support Structure: 9.1 meters above ground level

Overall Structure: 15.2 meters above ground level

Overall Height AMSL: 395.6 meters above mean sea level

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Shannon Lowman

From: Peter Steere <Peter.Steere@tonation-nsn.gov>
Sent: Friday, August 4, 2023 2:11 PM
To: Shannon Lowman
Subject: RE: TCNS 269922 Section 106 Review

Follow Up Flag: Follow up
Flag Status: Flagged

Shannon Lowman
ECA

The Tohono O'odham Nation has no issues or concerns regarding cell tower
269922

Peter L. Steere
THPO
Tohono O'odham Nation

From: Shannon Lowman [mailto:shannon.lowman@eca-usa.com]
Sent: Friday, August 4, 2023 10:19 AM
To: psteere@toua.net
Cc: Peter Steere <Peter.Steere@tonation-nsn.gov>
Subject: TCNS 269922 Section 106 Review

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Tohono O'odham Nation through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID # 269922
Cultural Resources Report for a Proposed Collocation of Antennas on an Existing 30-Foot Tall Building, Guadalupe, Maricopa County, AZ
NTIA Grant No. NT22TBC0290057
ECA Project # 23-001205

We look forward to your response.

Thank you,

Shannon Lowman, MA, RPA
Principal Archaeologist
Environmental Corporation of America (ECA)
1375 Union Hill Industrial Court
Alpharetta, GA 30004
770-667-2040 x. 118 (office)
770-667-2041 (fax)
404-345-2301 (cell)

shannon.lowman@eca-usa.com
www.eca-usa.com

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Marana Tower Site

Environmental Corporation of America (ECA)

TRIBAL INVOLVEMENT SUMMARY

Site Name:		Marana		Site Number:		NA		NOO Date:		8/4/2023	
TCNS #:		269919		ECA Project#:		23-001200		ECA PM:		SAL	
NOO #	Tribal Entity Name	Date of Document Submittal	Method of Delivery	Email Address	Date of Escalation	Tribal Response Date	Tribal Response				
1	Pueblo of Zuni	8/4/2023	Electronic and Mail	kdongoske@gmail.com ; cdongoske@cableone.net	NA	NA	NA				
2	Apache Tribe of Oklahoma	8/4/2023	Electronic	Apacheculture510@yahoo.com	NA	NA	NA				
3	Eastern Shoshone Tribe	8/4/2023	Electronic (Website)	http://www.esthpo.com	NA	NA	NA				
4	Cocopah Indian Tribe	8/4/2023	Electronic	culturalres@cocopah.com ; brundinj@cocopah.com ; cocotcsec@cocopah.com	NA	NA	NA				
5	Tohono O'odham Nation	8/4/2023	Electronic	psteere@toua.net ; peter.steere@tonation-nsn.gov	NA	8/4/2023	Cleared via Email				
6	Ak Chin Indian Community Council	8/4/2023	Electronic	cnarcia@ak-chin.nsn.us ; EPeters@ak-chin.nsn.us	NA	8/30/2023	Cleared via TCNS				
7	Pascua Yaqui Tribe	7/13/2023	Electronic	khoerig@pascuayaqui-nsn.gov	NA	9/15/2023	Cleared via Letter				
8	Tonto Apache Tribal Council	8/4/2023	Electronic	idecola@tontoapache.org	NA	8/3/2023	*Cleared via 30-day response agreement per NOO				
9	Kaibab Band of Paiute Indians	8/4/2023	Electronic and Mail	dbullets@kaibabpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO				
10	San Juan Southern Paiute Tribe	8/4/2023	Electronic	k.barlow@saniuanpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO				
11	Skull Valley Band of Goshute	8/4/2023	Electronic and Mail	candaceb@svqoshutes.com	NA	8/3/2023	*Cleared via 30-day response agreement per NOO				
12	Mescalero Apache Tribe	8/4/2023	Electronic	holly@mathpo.org	NA	NA	NA				
13	White Mountain Apache Tribe	8/4/2023	Electronic and Mail	markaltaha@wmat.us	NA	NA	NA				
14	Hopi Cultural Preservation Office	8/4/2023	Electronic and Mail	tmorgart@hopi.nsn.us ; SKoviyumptewa@hopi.nsn.us ; jmaase@hopi.nsn.us	NA	8/14/2023	Cleared via TCNS				
15	Yavapai-Apache Community Council	8/4/2023	Electronic and Mail	ccoder@yan-tribe.org	NA	NA	NA				
16	Gila River Indian Community	8/4/2023	Electronic and Mail	Catherine.Thomas@gric.nsn.us ; Larry.BenallieJr@gric.nsn.us ; Barnaby.Lewis@gric.nsn.us ; Kyle.Woodson@gric.nsn.us	NA	8/7/2023	Cleared via Email				
17	Salt River Pima-Maricopa Indian Community	8/4/2023	Electronic	angela.garcia-lewis@srpmic-nsn.gov ; shane.anton@srpmic-nsn.gov	NA	NA	NA				

*30-Day Response Agreement Language: "If the applicant/tower builder receives no response from the Tribe within 30 days after notification through TCNS, the Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law."

Shannon Lowman

From: Peter Steere <Peter.Steere@tonation-nsn.gov>
Sent: Friday, August 4, 2023 2:04 PM
To: Shannon Lowman
Subject: RE: TCNS 269919 Section 106 Review

Follow Up Flag: Follow up
Flag Status: Flagged

Shannon Lowman
ECA

The Tohono O'odham Nation has no issues or concerns regarding Cell Tower site 269919

Peter L. Steere
THPO
Tohono O'odham Nation

From: Shannon Lowman [mailto:shannon.lowman@eca-usa.com]
Sent: Friday, August 4, 2023 8:54 AM
To: psteere@toa.net
Cc: Peter Steere <Peter.Steere@tonation-nsn.gov>
Subject: TCNS 269919 Section 106 Review

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Tohono O'odham Nation through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID # 269919
Class III Cultural Resources Survey for a Proposed 75-Foot Tall Monopole Telecommunications Structure, Marana, Pima County, AZ
NTIA Grant No. NT22TBC0290057
ECA Project # 23-001200

We look forward to your response.

Thank you,

Shannon Lowman, MA, RPA
Principal Archaeologist
Environmental Corporation of America (ECA)
1375 Union Hill Industrial Court
Alpharetta, GA 30004
770-667-2040 x. 118 (office)
770-667-2041 (fax)
404-345-2301 (cell)
shannon.lowman@eca-usa.com

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Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Wednesday, August 30, 2023 4:55 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; cnarcia@ak-chin.nsn.us; EPeters@ak-chin.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269919) - Email ID #8657613

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Cultural Resources Representative Carmen E Narcia of the Ak Chin Indian Community Council in reference to Notification ID #269919:

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269919
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: MTOWER - Monopole
Latitude: 32 deg 26 min 48.2 sec N
Longitude: 111 deg 12 min 55.6 sec W
Location Description: 11720-11738 W Camino Pinos
City: Marana
State: ARIZONA
County: PIMA

Detailed Description of Project: 23-001200: NTIA funded- Proposed 75-foot Overall Height Monopole
Telecommunications Structure
Ground Elevation: 607.2 meters
Support Structure: 22.9 meters above ground level
Overall Structure: 22.9 meters above ground level
Overall Height AMSL: 630.1 meters above mean sea level

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PASCUA YAQUI TRIBE

DEPARTMENT OF LANGUAGE AND CULTURE ITOM HIAK LUTU'URIA YO'ORIWA INTO NAKWA



September 15, 2023

Shannon Lowman, MA, RPA
Principal Archaeologist/Assistant Tribal Coordinator
Environmental Corporation of America
1375 Union Hill Industrial Court
Alpharetta, GA 30004

Dear Ms. Lowman,

I am writing in response to your request for consultation regarding the planned installation of communications fiber and towers in various Pascua Yaqui communities in Arizona.

23-001205: Guadalupe

The Pascua Yaqui Tribal Historic Preservation Office (PYTHPO) concurs with the determination of “no adverse effect” to historic properties for the collocation of broadband devices on the building located at 9405 S. Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona.

23-001191: Coolidge

PYTHPO concurs with the determination of “no adverse effect” to historic properties for the construction of a communications tower and associated fixtures in Coolidge, Pinal County, Arizona.

23-001200: Marana

PYTHPO concurs with the determination of “no adverse effect” to historic properties for the construction of a communications monopole tower and associated fixtures on Pascua Yaqui Tribal fee land at Yoem Pueblo, Marana, Pima County, Arizona.

23-001190: Milagros (Barrio Libre)

PYTHPO concurs with the determination of “no adverse effect” to historic properties for the construction of a communications monopole tower and associated fixtures, including the installation of a 100 foot long buried fiber route, with the following conditions: The project site is within the boundaries of NRHP-eligible archaeological site AZ BB:13:17 (ASM) and is within the City of Tucson’s Julian Wash Archaeological Sensitivity Zone. All initial ground disturbance for this project should be monitored by a qualified archaeologist. PYTHPO will provide monitoring for work completed on the Tribe’s fee lands. Ground disturbance that occurs in the City of Tucson ROW must be monitored by a city-approved archaeological monitor. Per Tohono O’Odham Nation request, excavation for the fiber line should be completed by use of a back hoe rather than a trencher to facilitate identification of any subsurface cultural materials that might be present.

Hiak Noki
Language Program

Itom Sauwa'u
Traditional Arts Program

Hiak Etehuri, Hiak Lutu'uria
History and Culture Program

Veeme Ya'uchia
Miss Pascua Yaqui Program

5100 W. Calle Tetakusim • Tucson, Arizona 85757 • Phone (520) 879-5939 • FAX (520) 879-5747
E-mail: LanguageAndCulture@pascuayaqui-nsn.gov

23-001365: Tortuga Ranch to New Pascua Pueblo

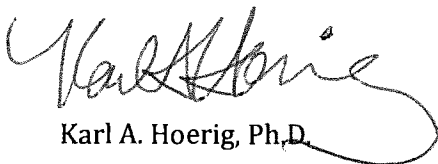
PYTHPO concurs with the determination of “no adverse effect” to historic properties for the installation of buried and aerial fiber between the Tribe’s Tortuga Ranch and locations on the Tribe’s reservation and trust lands at New Pascua Pueblo with the following conditions: Contractors will consult with PYTHPO to flag for avoidance any remaining unexcavated/mitigated portions of AZ AA:16:440(ASM) and the stone ring identified as IF 3 in the “Yaqui Square” development area on the Tribe’s reservation and trust lands. Should an any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

23-001203: Old Pascua Village

This project will be undertaken on lands that are in the process of conversion from Pascua Yaqui Tribe fee lands to Trust lands, and as such will be subject to review by the PYTHPO. The APE includes a portion of the National Register-listed Antonio Matus House and Property and the entirety of the APE is located within the City of Tucson Stone Pipe Archaeological Sensitivity Zone. Because the communications tower is an existing facility, this project should meet the standard of “no adverse effect” to historic properties. Project contractors must take care to avoid any ground disturbance or other activities what would cause adverse effect to the historic house, including any changes to precipitation runoff patterns that would increase moisture near the house. No trenching should be undertaken adjacent to the historic house. If any ground disturbance will occur within the City of Tucson ROW, an outside archaeological monitor must be utilized to meet City requirements in the Archaeological Sensitivity Zone. Should any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

If you have any additional questions or concerns about these projects, or require any additional review by our office, please contact me at (520) 883-5116 or karl.hoerig@pascuayaqui-nsn.gov.

With warmest regards,



Karl A. Hoerig, Ph.D.

Pascua Yaqui Tribal Historic Preservation Officer

Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Monday, August 14, 2023 8:13 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; jmaase@hopi.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269919) - Email ID #8641166

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Archeologist Jakob Maase of the Hopi Cultural Preservation Office in reference to Notification ID #269919:

The Hopi Tribe has reviewed this report and concurs with its findings of no "adverse effect."

Thank you.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269919
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: MTOWER - Monopole
Latitude: 32 deg 26 min 48.2 sec N
Longitude: 111 deg 12 min 55.6 sec W
Location Description: 11720-11738 W Camino Pinos
City: Marana
State: ARIZONA
County: PIMA

Detailed Description of Project: 23-001200: NTIA funded- Proposed 75-foot Overall Height Monopole
Telecommunications Structure
Ground Elevation: 607.2 meters
Support Structure: 22.9 meters above ground level
Overall Structure: 22.9 meters above ground level
Overall Height AMSL: 630.1 meters above mean sea level

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Shannon Lowman

From: Larry Benallie Jr <Larry.BenallieJr@gric.nsn.us>
Sent: Monday, August 7, 2023 2:12 PM
To: Shannon Lowman
Cc: Peter Steere (peter.steere@tonation-nsn.gov); Caroline Klebacha; Catherine Thomas
Subject: TCNS 269919
Attachments: Marana_Section 106_ECA_23-001200.pdf

TCNS 269919 is located south of Toltec Road, Eloy, Pinal County, Arizona. The GRIC-THPO defers to the Tohono O'Odham Nation (TON) as lead in the consultation for this undertaking.

Respectfully,

Larry Benallie, Jr.

Archaeological Compliance Specialist
Tribal Historic Preservation Office
Gila River Indian Community
P.O. Box 2193
Sacaton, Arizona 85147
(520) 562-7153
Larry.BenallieJr@gric.nsn.us

[Government to Government Consultation Toolkit](#)

From: Shannon Lowman <shannon.lowman@eca-usa.com>
Sent: Friday, August 4, 2023 8:54 AM
To: Catherine Thomas <Catherine.Thomas@gric.nsn.us>
Cc: Larry Benallie Jr <Larry.BenallieJr@gric.nsn.us>; Barnaby Lewis <barnaby.lewis@gric.nsn.us>; Kyle Woodson <Kyle.Woodson@gric.nsn.us>
Subject: TCNS 269919 Section 106 Review

CAUTION: The sender shannon.lowman@eca-usa.com is from outside of GRIC. Do not open attachments or click on any links if you do not recognize the sender.

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Gila River Indian Community through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID # 269919
Class III Cultural Resources Survey for a Proposed 75-Foot Tall Monopole Telecommunications Structure, Marana, Pima County, AZ
NTIA Grant No. NT22TBC0290057
ECA Project # 23-001200

We look forward to your response.

Thank you,

Shannon Lowman, MA, RPA
Principal Archaeologist
Environmental Corporation of America (ECA)
1375 Union Hill Industrial Court
Alpharetta, GA 30004
770-667-2040 x. 118 (office)
770-667-2041 (fax)
404-345-2301 (cell)
shannon.lowman@eca-usa.com
www.eca-usa.com

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Milagros Tower Site

Environmental Corporation of America (ECA)

TRIBAL INVOLVEMENT SUMMARY

Site Name:		Milagros	Site Number:		NA	NOO Date:		8/4/2023
TCNS #:		269915	ECA Project#:		23-001190	ECA PM:		SAL
NOO #	Tribal Entity Name	Date of Document Submittal	Method of Delivery	Email Address	Date of Escalation	Tribal Response Date	Tribal Response	
1	Pueblo of Zuni	8/4/2023	Electronic and Mail	kdongoske@gmail.com ; cdongoske@cablone.net	NA	NA	NA	
2	Apache Tribe of Oklahoma	8/4/2023	Electronic	Apacheculture510@yahoo.com	NA	NA	NA	
3	Eastern Shoshone Tribe	8/4/2023	Electronic (Website)	http://www.esthpo.com	NA	NA	NA	
4	Cocopah Indian Tribe	8/4/2023	Electronic	culturalres@cocopah.com ; brundini@cocopah.com ; cocotcsec@cocopah.com	NA	NA	NA	
5	Tohono O'odham Nation	8/4/2023	Electronic	psteere@touna.net ; peter.steere@tonation-nsn.gov	NA	8/4/2023	Cleared via email. The tribe recommended that there be a cultural monitor on site during construction and requested that the fiber line be excavated with a trencher.	
6	Ak Chin Indian Community Council	8/4/2023	Electronic	cnarcia@ak-chin.nsn.us ; EPeters@ak-chin.nsn.us	NA	8/30/2023	Cleared via TCNS	
7	Pascua Yaqui Tribe	7/13/2023	Electronic	khoerig@pascuayaqui-nsn.gov	NA	9/15/2023	Cleared via Letter. The Tribe has stated that the PYTHPO will provide monitoring for work completed on the Tribe's fee lands. Ground disturbance that occurs in the City of Tucson ROW must be monitored by a city-approved archaeological monitor. Fiber excavation must be completed with a backhoe rather than a trencher.	
8	Tonto Apache Tribal Council	8/4/2023	Electronic	jdecola@tontoapache.org	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
9	Kaibab Band of Paiute Indians	8/4/2023	Electronic and Mail	dbulletts@kaibabpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
10	San Juan Southern Paiute Tribe	8/4/2023	Electronic	k.barlow@sanjuanpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
11	Skull Valley Band of Goshute	8/4/2023	Electronic and Mail	candaceb@svgoshutes.com	NA	8/3/2023	*Cleared via 30-day response agreement per NOO	
12	Mescalero Apache Tribe	8/4/2023	Electronic	holly@mathpo.org	NA	NA	NA	
13	White Mountain Apache Tribe	8/4/2023	Electronic and Mail	markaltaha@wmat.us	NA	NA	NA	
14	Hopi Cultural Preservation Office	8/4/2023	Electronic and Mail	tmorgart@hopi.nsn.us ; SKoviyumptewa@hopi.nsn.us ; jmaase@hopi.nsn.us	NA	8/14/2023	Cleared via TCNS	
15	Yavapai-Apache Community Council	8/4/2023	Electronic and Mail	ccoder@yan-tribe.org	NA	NA	NA	
16	Gila River Indian Community	8/4/2023	Electronic and Mail	Catherine.Thomas@gric.nsn.us ; Larry.BenallieJr@gric.nsn.us ; Barnaby.Lewis@gric.nsn.us ; Kyle.Woodson@gric.nsn.us	NA	8/7/2023	Cleared via Email	
17	Salt River Pima-Maricopa Indian Community	8/4/2023	Electronic	angela.garcia-lewis@srpmic-nsn.gov ; shane.anton@srpmic-nsn.gov	NA	NA	NA	

*30-Day Response Agreement Language: "If the applicant/tower builder receives no response from the Tribe within 30 days after notification through TCNS, the Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law."

Shannon Lowman

From: Peter Steere <Peter.Steere@tonation-nsn.gov>
Sent: Friday, August 4, 2023 1:58 PM
To: Shannon Lowman
Cc: Karl Hoerig
Subject: RE: TCNS 269915 Section 106 Review

Follow Up Flag: Follow up
Flag Status: Flagged

Shannon Lowman
ECA

Thank you for consulting with the Tohono O'odham Nation on this proposed cell tower construction at 899 West 44th Street in Tucson, Arizona

There is a Hohokam site (AZ BB:13:17 ASM) located in the project area

The Tohono O'odham Nation recommends that there be a cultural monitor on site during construction and excavation for a fiber line

The fiber line should be excavated with a back hoe rather than a trencher.

Please notify my office and Karl Hoerig, Pascua Yaqui THPO if cultural materials are encountered during construction

Peter L. Steere
THPO
Tohono O'odham Nation

From: Shannon Lowman [mailto:shannon.lowman@eca-usa.com]
Sent: Friday, August 4, 2023 7:19 AM
To: psteere@tousa.net
Cc: Peter Steere <Peter.Steere@tonation-nsn.gov>
Subject: TCNS 269915 Section 106 Review

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Tohono O'odham Nation through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID # 269915
Class III Cultural Resources Survey for a Proposed 75-Foot Tall Monopole
Telecommunications Structure, Tucson, Pima County, AZ
NTIA Grant No. NT22TBC0290057
ECA Project # 23-001190

We look forward to your response.

Thank you,

Shannon Lowman, MA, RPA
Principal Archaeologist
Environmental Corporation of America (ECA)
1375 Union Hill Industrial Court
Alpharetta, GA 30004
770-667-2040 x. 118 (office)
770-667-2041 (fax)
404-345-2301 (cell)
shannon.lowman@eca-usa.com
www.eca-usa.com

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Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Wednesday, August 30, 2023 4:55 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; cnarcia@ak-chin.nsn.us; EPeters@ak-chin.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269915) - Email ID #8657615

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Cultural Resources Representative Carmen E Narcia of the Ak Chin Indian Community Council in reference to Notification ID #269915:

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269915
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: MTOWER - Monopole
Latitude: 32 deg 11 min 5.6 sec N
Longitude: 110 deg 59 min 1.6 sec W
Location Description: 899 W 44th Street
City: Tucson
State: ARIZONA
County: PIMA

Detailed Description of Project: 23-001190: NTIA funded- Proposed 75-foot Overall Height Monopole
Telecommunications Structure
Ground Elevation: 732.1 meters
Support Structure: 22.9 meters above ground level
Overall Structure: 22.9 meters above ground level
Overall Height AMSL: 755.0 meters above mean sea level

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PASCUA YAQUI TRIBE

DEPARTMENT OF LANGUAGE AND CULTURE ITOM HIAK LUTU'URIA YO'ORIWA INTO NAKWA



September 15, 2023

Shannon Lowman, MA, RPA
Principal Archaeologist/Assistant Tribal Coordinator
Environmental Corporation of America
1375 Union Hill Industrial Court
Alpharetta, GA 30004

Dear Ms. Lowman,

I am writing in response to your request for consultation regarding the planned installation of communications fiber and towers in various Pascua Yaqui communities in Arizona.

23-001205: Guadalupe

The Pascua Yaqui Tribal Historic Preservation Office (PYTHPO) concurs with the determination of “no adverse effect” to historic properties for the collocation of broadband devices on the building located at 9405 S. Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona.

23-001191: Coolidge

PYTHPO concurs with the determination of “no adverse effect” to historic properties for the construction of a communications tower and associated fixtures in Coolidge, Pinal County, Arizona.

23-001200: Marana

PYTHPO concurs with the determination of “no adverse effect” to historic properties for the construction of a communications monopole tower and associated fixtures on Pascua Yaqui Tribal fee land at Yoem Pueblo, Marana, Pima County, Arizona.

23-001190: Milagros (Barrio Libre)

PYTHPO concurs with the determination of “no adverse effect” to historic properties for the construction of a communications monopole tower and associated fixtures, including the installation of a 100 foot long buried fiber route, with the following conditions: The project site is within the boundaries of NRHP-eligible archaeological site AZ BB:13:17 (ASM) and is within the City of Tucson’s Julian Wash Archaeological Sensitivity Zone. All initial ground disturbance for this project should be monitored by a qualified archaeologist. PYTHPO will provide monitoring for work completed on the Tribe’s fee lands. Ground disturbance that occurs in the City of Tucson ROW must be monitored by a city-approved archaeological monitor. Per Tohono O’Odham Nation request, excavation for the fiber line should be completed by use of a back hoe rather than a trencher to facilitate identification of any subsurface cultural materials that might be present.

Hiak Noki
Language Program

Itom Sauwa'u
Traditional Arts Program

Hiak Etehori, Hiak Lutu'uria
History and Culture Program

Veeme Ya'uchia
Miss Pascua Yaqui Program

5100 W. Calle Tetakusim • Tucson, Arizona 85757 • Phone (520) 879-5939 • FAX (520) 879-5747
E-mail: LanguageAndCulture@pascuayaqui-nsn.gov

23-001365: Tortuga Ranch to New Pascua Pueblo

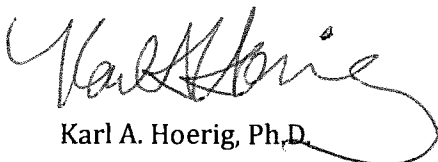
PYTHPO concurs with the determination of “no adverse effect” to historic properties for the installation of buried and aerial fiber between the Tribe’s Tortuga Ranch and locations on the Tribe’s reservation and trust lands at New Pascua Pueblo with the following conditions: Contractors will consult with PYTHPO to flag for avoidance any remaining unexcavated/mitigated portions of AZ AA:16:440(ASM) and the stone ring identified as IF 3 in the “Yaqui Square” development area on the Tribe’s reservation and trust lands. Should an any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

23-001203: Old Pascua Village

This project will be undertaken on lands that are in the process of conversion from Pascua Yaqui Tribe fee lands to Trust lands, and as such will be subject to review by the PYTHPO. The APE includes a portion of the National Register-listed Antonio Matus House and Property and the entirety of the APE is located within the City of Tucson Stone Pipe Archaeological Sensitivity Zone. Because the communications tower is an existing facility, this project should meet the standard of “no adverse effect” to historic properties. Project contractors must take care to avoid any ground disturbance or other activities what would cause adverse effect to the historic house, including any changes to precipitation runoff patterns that would increase moisture near the house. No trenching should be undertaken adjacent to the historic house. If any ground disturbance will occur within the City of Tucson ROW, an outside archaeological monitor must be utilized to meet City requirements in the Archaeological Sensitivity Zone. Should any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

If you have any additional questions or concerns about these projects, or require any additional review by our office, please contact me at (520) 883-5116 or karl.hoerig@pascuayaqui-nsn.gov.

With warmest regards,



Karl A. Hoerig, Ph.D.

Pascua Yaqui Tribal Historic Preservation Officer

Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Monday, August 14, 2023 8:08 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; jmaase@hopi.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269915) - Email ID #8641164

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Archeologist Jakob Maase of the Hopi Cultural Preservation Office in reference to Notification ID #269915:

Hopi has reviewed this report and finds its findings of no "adverse effect" adequate.

Thank you.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269915
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: MTOWER - Monopole
Latitude: 32 deg 11 min 5.6 sec N
Longitude: 110 deg 59 min 1.6 sec W
Location Description: 899 W 44th Street
City: Tucson
State: ARIZONA
County: PIMA

Detailed Description of Project: 23-001190: NTIA funded- Proposed 75-foot Overall Height Monopole
Telecommunications Structure
Ground Elevation: 732.1 meters
Support Structure: 22.9 meters above ground level
Overall Structure: 22.9 meters above ground level
Overall Height AMSL: 755.0 meters above mean sea level

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Shannon Lowman

From: Larry Benallie Jr <Larry.BenallieJr@gric.nsn.us>
Sent: Monday, August 7, 2023 2:13 PM
To: Shannon Lowman
Cc: Peter Steere (peter.steere@tonation-nsn.gov); Caroline Klebacha; Catherine Thomas
Subject: TCNS 269915
Attachments: Milagros_Section 106_ECA_23-001190.pdf

TCNS 269915 is located south of Toltec Road, Eloy, Pinal County, Arizona. The GRIC-THPO defers to the Tohono O'odham Nation (TON) as lead in the consultation for this undertaking. Thank you for contacting the GRIC-THPO regarding this undertaking.

Respectfully,

Larry Benallie, Jr.

Archaeological Compliance Specialist
Tribal Historic Preservation Office
Gila River Indian Community
P.O. Box 2193
Sacaton, Arizona 85147
(520) 562-7153
Larry.BenallieJr@gric.nsn.us

[Government to Government Consultation Toolkit](#)

From: Shannon Lowman <shannon.lowman@eca-usa.com>
Sent: Friday, August 4, 2023 7:19 AM
To: Catherine Thomas <Catherine.Thomas@gric.nsn.us>
Cc: Larry Benallie Jr <Larry.BenallieJr@gric.nsn.us>; Barnaby Lewis <barnaby.lewis@gric.nsn.us>; Kyle Woodson <Kyle.Woodson@gric.nsn.us>
Subject: TCNS 269915 Section 106 Review

CAUTION: The sender shannon.lowman@eca-usa.com is from outside of GRIC. Do not open attachments or click on any links if you do not recognize the sender.

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Gila River Indian Community through the FCC Tower Construction Notification System (TCNS).

Section 106 Review
TCNS ID # 269915
Class III Cultural Resources Survey for a Proposed 75-Foot Tall Monopole
Telecommunications Structure, Tucson, Pima County, AZ
NTIA Grant No. NT22TBC0290057
ECA Project # 23-001190

We look forward to your response.

Thank you,

Shannon Lowman, MA, RPA
Principal Archaeologist
Environmental Corporation of America (ECA)
1375 Union Hill Industrial Court
Alpharetta, GA 30004
770-667-2040 x. 118 (office)
770-667-2041 (fax)
404-345-2301 (cell)
shannon.lowman@eca-usa.com
www.eca-usa.com

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Old Pascua Tower Site

Environmental Corporation of America (ECA)

TRIBAL INVOLVEMENT SUMMARY

Site Name:		Old Pascua		Site Number:		NA		NOO Date:		8/4/2023	
TCNS #:		269921		ECA Project#:		23-001203		ECA PM:		SAL	
NOO #	Tribal Entity Name	Date of Document Submittal	Method of Delivery	Email Address	Date of Escalation	Tribal Response Date	Tribal Response				
1	Pueblo of Zuni	8/4/2023	Electronic and Mail	kdongoske@gmail.com ; cdongoske@cableone.net	NA	NA	NA				
2	Apache Tribe of Oklahoma	8/4/2023	Electronic	Apacheculture510@yahoo.com	NA	NA	NA				
3	Eastern Shoshone Tribe	8/4/2023	Electronic (Website)	http://www.esthpo.com	NA	NA	NA				
4	Cocopah Indian Tribe	8/4/2023	Electronic	culturalres@cocopah.com ; brundini@cocopah.com ; cocotcsec@cocopah.com	NA	NA	NA				
5	Tohono O'odham Nation	8/4/2023	Electronic	psteere@toua.net ; peter.steere@tonation-nsn.gov	NA	8/4/2023	Cleared via Email				
6	Ak Chin Indian Community Council	8/4/2023	Electronic	cnarcia@ak-chin.nsn.us ; EPeters@ak-chin.nsn.us	NA	8/30/2023	Cleared via TCNS				
7	Pascua Yaqui Tribe	7/13/2023	Electronic	khoerig@pascuayaqui-nsn.gov	NA	9/15/2023	Cleared via Letter. PYT has stated that contractors must avoid any ground disturbance or activities that may cause adverse effect to the historic house. No trenching may occur adjacent to the house. If any ground disturbance will occur w/in City of Tucson ROW, there must be a city approve archaeological monitor.				
8	Tonto Apache Tribal Council	8/4/2023	Electronic	jdecola@tontoapache.org	NA	8/3/2023	*Cleared via 30-day response agreement per NOO				
9	Kaibab Band of Paiute Indians	8/4/2023	Electronic and Mail	dbulletts@kaibabpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO				
10	San Juan Southern Paiute Tribe	8/4/2023	Electronic	k.barlow@sanjuanpaiute-nsn.gov	NA	8/3/2023	*Cleared via 30-day response agreement per NOO				
11	Skull Valley Band of Goshute	8/4/2023	Electronic and Mail	candaceb@svgoshutes.com	NA	8/3/2023	*Cleared via 30-day response agreement per NOO				
12	Mescalero Apache Tribe	8/4/2023	Electronic	holly@mathpo.org	NA	NA	NA				
13	White Mountain Apache Tribe	8/4/2023	Electronic and Mail	markaltaha@wmat.us	NA	NA	NA				
14	Hopi Cultural Preservation Office	8/4/2023	Electronic and Mail	tmorgart@hopi.nsn.us ; SKoviyumptewa@hopi.nsn.us ; imaase@hopi.nsn.us	NA	8/14/2023	Cleared via TCNS				
15	Yavapai-Apache Community Council	8/4/2023	Electronic and Mail	ccoder@yan-tribe.org	NA	NA	NA				
16	Gila River Indian Community	8/4/2023	Electronic and Mail	Catherine.Thomas@gric.nsn.us ; Larry.BenallieJr@gric.nsn.us ; Barnaby.Lewis@gric.nsn.us ; Kyle.Woodson@gric.nsn.us	NA	8/7/2023	Cleared via Email				
17	Salt River Pima-Maricopa Indian Community	8/4/2023	Electronic	angela.garcia-lewis@srpmic-nsn.gov ; shane.anton@srpmic-nsn.gov	NA	NA	NA				

*30-Day Response Agreement Language: "If the applicant/tower builder receives no response from the Tribe within 30 days after notification through TCNS, the Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law."

Shannon Lowman

From: Peter Steere <Peter.Steere@tonation-nsn.gov>
Sent: Friday, August 4, 2023 2:08 PM
To: Shannon Lowman
Subject: RE: TCNS 269921 Section 106 Review

Follow Up Flag: Follow up
Flag Status: Flagged

Shannon Lowman
ECA

The Tohono O'odham Nation has no issues or concerns regarding Cell Tower 269921 construction

Peter L. Steere
THPO
Tohono O'odham Nation

From: Shannon Lowman [mailto:shannon.lowman@eca-usa.com]
Sent: Friday, August 4, 2023 9:38 AM
To: psteere@toa.net
Cc: Peter Steere <Peter.Steere@tonation-nsn.gov>
Subject: TCNS 269921 Section 106 Review

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Tohono O'odham Nation through the FCC Tower Construction Notification System (TCNS).

Section 106 Review

TCNS ID # 269921

Class III Cultural Resources Survey for a Proposed Collocation of Antennas on an Existing 80-Foot Tall Overall Height Self-Supporting Lattice Telecommunications Structure and Addition of Ground Level Equipment, Tucson, Pima County, AZ

NTIA Grant No. NT22TBC0290057

ECA Project # 23-001203

We look forward to your response.

Thank you,

Shannon Lowman, MA, RPA
Principal Archaeologist
Environmental Corporation of America (ECA)
1375 Union Hill Industrial Court
Alpharetta, GA 30004
770-667-2040 x. 118 (office)
770-667-2041 (fax)
404-345-2301 (cell)

shannon.lowman@eca-usa.com
www.eca-usa.com

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Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Wednesday, August 30, 2023 4:55 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; cnarcia@ak-chin.nsn.us; EPeters@ak-chin.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269921) - Email ID #8657612

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Cultural Resources Representative Carmen E Narcia of the Ak Chin Indian Community Council in reference to Notification ID #269921:

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269921
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: LTOWER - Lattice Tower
Latitude: 32 deg 14 min 53.3 sec N
Longitude: 110 deg 59 min 9.7 sec W
Location Description: 856 W Calle Santa Ana
City: Tucson
State: ARIZONA
County: PIMA

Detailed Description of Project: 23-001203: NTIA funded- Proposed 80-foot Overall Height Self-Supporting Lattice Telecommunications Structure

Ground Elevation: 712.6 meters

Support Structure: 24.4 meters above ground level

Overall Structure: 24.4 meters above ground level

Overall Height AMSL: 737.0 meters above mean sea level

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PASCUA YAQUI TRIBE

DEPARTMENT OF LANGUAGE AND CULTURE ITOM HIAK LUTU'URIA YO'ORIWA INTO NAKWA



September 15, 2023

Shannon Lowman, MA, RPA
Principal Archaeologist/Assistant Tribal Coordinator
Environmental Corporation of America
1375 Union Hill Industrial Court
Alpharetta, GA 30004

Dear Ms. Lowman,

I am writing in response to your request for consultation regarding the planned installation of communications fiber and towers in various Pascua Yaqui communities in Arizona.

23-001205: Guadalupe

The Pascua Yaqui Tribal Historic Preservation Office (PYTHPO) concurs with the determination of "no adverse effect" to historic properties for the collocation of broadband devices on the building located at 9405 S. Avenida Del Yaqui, Guadalupe, Maricopa County, Arizona.

23-001191: Coolidge

PYTHPO concurs with the determination of "no adverse effect" to historic properties for the construction of a communications tower and associated fixtures in Coolidge, Pinal County, Arizona.

23-001200: Marana

PYTHPO concurs with the determination of "no adverse effect" to historic properties for the construction of a communications monopole tower and associated fixtures on Pascua Yaqui Tribal fee land at Yoem Pueblo, Marana, Pima County, Arizona.

23-001190: Milagros (Barrio Libre)

PYTHPO concurs with the determination of "no adverse effect" to historic properties for the construction of a communications monopole tower and associated fixtures, including the installation of a 100 foot long buried fiber route, with the following conditions: The project site is within the boundaries of NRHP-eligible archaeological site AZ BB:13:17 (ASM) and is within the City of Tucson's Julian Wash Archaeological Sensitivity Zone. All initial ground disturbance for this project should be monitored by a qualified archaeologist. PYTHPO will provide monitoring for work completed on the Tribe's fee lands. Ground disturbance that occurs in the City of Tucson ROW must be monitored by a city-approved archaeological monitor. Per Tohono O'Odham Nation request, excavation for the fiber line should be completed by use of a back hoe rather than a trencher to facilitate identification of any subsurface cultural materials that might be present.

Hiak Noki
Language Program

Itom Sauwa'u
Traditional Arts Program

Hiak Etehori, Hiak Lutu'uria
History and Culture Program

Veeme Ya'uchia
Miss Pascua Yaqui Program

5100 W. Calle Tetakusim • Tucson, Arizona 85757 • Phone (520) 879-5939 • FAX (520) 879-5747
E-mail: LanguageAndCulture@pascuayaqui-nsn.gov

23-001365: Tortuga Ranch to New Pascua Pueblo

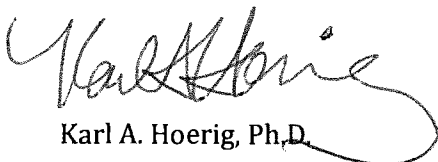
PYTHPO concurs with the determination of “no adverse effect” to historic properties for the installation of buried and aerial fiber between the Tribe’s Tortuga Ranch and locations on the Tribe’s reservation and trust lands at New Pascua Pueblo with the following conditions: Contractors will consult with PYTHPO to flag for avoidance any remaining unexcavated/mitigated portions of AZ AA:16:440(ASM) and the stone ring identified as IF 3 in the “Yaqui Square” development area on the Tribe’s reservation and trust lands. Should an any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

23-001203: Old Pascua Village

This project will be undertaken on lands that are in the process of conversion from Pascua Yaqui Tribe fee lands to Trust lands, and as such will be subject to review by the PYTHPO. The APE includes a portion of the National Register-listed Antonio Matus House and Property and the entirety of the APE is located within the City of Tucson Stone Pipe Archaeological Sensitivity Zone. Because the communications tower is an existing facility, this project should meet the standard of “no adverse effect” to historic properties. Project contractors must take care to avoid any ground disturbance or other activities what would cause adverse effect to the historic house, including any changes to precipitation runoff patterns that would increase moisture near the house. No trenching should be undertaken adjacent to the historic house. If any ground disturbance will occur within the City of Tucson ROW, an outside archaeological monitor must be utilized to meet City requirements in the Archaeological Sensitivity Zone. Should any cultural material be encountered during ground disturbance within the Tribe’s fee/trust land, all work must stop within 15 meters and the PYTHPO contacted to determine whether the material is significant and whether additional investigation is required prior to continuation of work.

If you have any additional questions or concerns about these projects, or require any additional review by our office, please contact me at (520) 883-5116 or karl.hoerig@pascuayaqui-nsn.gov.

With warmest regards,



Karl A. Hoerig, Ph.D.

Pascua Yaqui Tribal Historic Preservation Officer

Shannon Lowman

From: towernotifyinfo@fcc.gov
Sent: Monday, August 14, 2023 8:03 PM
To: tribal.notify
Cc: tcns.fccarchive@fcc.gov; jmaase@hopi.nsn.us
Subject: Reply to Proposed Tower Structure (Notification ID: 269921) - Email ID #8641163

Dear Dina M Bazzill,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Archeologist Jakob Maase of the Hopi Cultural Preservation Office in reference to Notification ID #269921:

Hopi has reviewed this report and concurs with its findings.

Thank you.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 07/28/2023
Notification ID: 269921
Tower Owner Individual or Entity Name: Pascua Yaqui Tribe
Consultant Name: Dina M Bazzill
Street Address: 1375 Union Hill Industrial Court
Suite A
City: Alpharetta
State: GEORGIA
Zip Code: 30004
Phone: 770-667-2040
Email: tribal.notify@eca-usa.com

Structure Type: LTOWER - Lattice Tower
Latitude: 32 deg 14 min 53.3 sec N
Longitude: 110 deg 59 min 9.7 sec W
Location Description: 856 W Calle Santa Ana
City: Tucson
State: ARIZONA
County: PIMA

Detailed Description of Project: 23-001203: NTIA funded- Proposed 80-foot Overall Height Self-Supporting Lattice Telecommunications Structure

Ground Elevation: 712.6 meters

Support Structure: 24.4 meters above ground level

Overall Structure: 24.4 meters above ground level

Overall Height AMSL: 737.0 meters above mean sea level

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Shannon Lowman

From: Larry Benallie Jr <Larry.BenallieJr@gric.nsn.us>
Sent: Monday, August 7, 2023 2:10 PM
To: Shannon Lowman
Cc: Peter Steere (peter.steere@tonation-nsn.gov); Caroline Klebacha; Catherine Thomas
Subject: TCNS 269921
Attachments: Old Pascua_Section 106_ECA_23-001203.pdf

TCNS 269921 is located south of Toltec Road, Eloy, Pinal County, Arizona. The GRIC-THPO defers to the Tohono O'odham Nation (TON) as lead in the consultation for this undertaking (TCNS 261074). Thank you for contacting the GRIC-THPO regarding this undertaking.

Respectfully,

Larry Benallie, Jr.

Archaeological Compliance Specialist
Tribal Historic Preservation Office
Gila River Indian Community
P.O. Box 2193
Sacaton, Arizona 85147
(520) 562-7153
Larry.BenallieJr@gric.nsn.us

[Government to Government Consultation Toolkit](#)

From: Shannon Lowman <shannon.lowman@eca-usa.com>
Sent: Friday, August 4, 2023 9:37 AM
To: Catherine Thomas <Catherine.Thomas@gric.nsn.us>
Cc: Larry Benallie Jr <Larry.BenallieJr@gric.nsn.us>; Barnaby Lewis <barnaby.lewis@gric.nsn.us>; Kyle Woodson <Kyle.Woodson@gric.nsn.us>
Subject: TCNS 269921 Section 106 Review

CAUTION: The sender shannon.lowman@eca-usa.com is from outside of GRIC. Do not open attachments or click on any links if you do not recognize the sender.

Please see the attached Section 106 Review documentation for the following project based on interest expressed by the Gila River Indian Community through the FCC Tower Construction Notification System (TCNS).

Section 106 Review

TCNS ID # 269921

Class III Cultural Resources Survey for a Proposed Collocation of Antennas on an Existing 80-Foot Tall Overall Height Self-Supporting Lattice Telecommunications Structure and Addition of Ground Level Equipment, Tucson, Pima County, AZ

NTIA Grant No. NT22TBC0290057

ECA Project # 23-001203

We look forward to your response.

Thank you,

Shannon Lowman, MA, RPA
Principal Archaeologist
Environmental Corporation of America (ECA)
1375 Union Hill Industrial Court
Alpharetta, GA 30004
770-667-2040 x. 118 (office)
770-667-2041 (fax)
404-345-2301 (cell)
shannon.lowman@eca-usa.com
www.eca-usa.com

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Appendix G
List of Preparers

Name	Organization	Discipline/Expertise	Years of Experience	Role in Preparing EA
Ryan Edson	Environmental Corporation of America	NEPA / Cultural Resources	6 years	Document preparation
Eric Johnson	Environmental Corporation of America	NEPA/Environmental Sciences	14 years	Principal review and document preparation
Ashley Bean	Environmental Corporation of America	Biology/Environmental Sciences	1 year	Document preparation
Ben Salter	Environmental Corporation of America	NEPA/Biology/Environmental Sciences	23 years	Principal review and oversight
Shannon Lowman	Environmental Corporation of America	Cultural Resources	6 years	Document preparation
Dina Bazzill	Environmental Corporation of America	NEPA / Cultural Resources	15 years	Principal review and oversight