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# INTERNET FOR ALL

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## Finding of No Significant Impact

*Vertical Bridge BTS II, LLC (Grant Award  
No. 08-40-MM228)*



U.S. Department of Commerce  
National Telecommunications and Information Administration

# Finding of No Significant Impact

## National Telecommunications and Information Administration Middle Mile Grant Program

Proposed 310-Foot Tall Self-Supporting Lattice Telecommunications Structure

### Overview

This document serves as the Finding of No Significant Impact (FONSI) for the following project awarded by the National Telecommunications and Information Administration (NTIA). NTIA has completed the **sufficiency review of the recipient’s Environmental Assessment (EA) and has determined that the project will not have a significant impact on the environment. The FONSI contains information related to the review.**

Recipient Name:	Zayo Group, LLC, Subgrantee: Vertical Bridge BTS II, LLC
Grant Project Name:	US-TX-6056 (DA02178) Proposed 310-Foot Tall Self-Supporting Lattice Telecommunications Structure
Grant Award No.	08-40-MM228
Program Location:	Wood County, Texas

### Program Summary

The NTIA awarded a grant to Zayo Group, LLC through the Middle Mile (MM) Grant Program, authorized by the Infrastructure Investment and Jobs Act of 2021, Division F, Title IV, Section 60401, Public Law 117-58, 135 Stat. 429 (November 15, 2021) (Infrastructure Act or Act), also known as the Bipartisan Infrastructure Law. The MM program provides funding to encourage the expansion and extension of MM infrastructure to reduce the cost of connecting unserved and underserved areas to the backbone of the Internet (commonly referred to as the “last mile”) and to promote broadband connection resiliency through the creation of alternative network connection paths that can be designed to prevent single points of failure on a broadband network. Zayo Group, LLC partnered with Vertical Bridge BTS II, LLC, (VB BTS II), as a subgrantee. The VB BTS II Project is called the US-TX-6056 Middle-Mile Broadband Network Project and activities are scheduled to occur in Wood County, Texas.

VB BTS II completed an EA for this Project in November 2024. NTIA reviewed the EA. NTIA issued the Draft EA for public comment on November 13, 2024. After the Draft EA public comment period closed on December 13, 2024, NTIA determined the EA is sufficient, and adopted it as part of the development of this FONSI.

The Project includes:

- **Project Activity 1 (Preferred Alternative):** Construction and maintenance of Middle-Mile Broadband Network (MMBN) infrastructure including a 310-foot tall overhead height self-supporting lattice telecommunication structure in Wood County, Texas.

Based on a review of the analysis in the EA, NTIA has determined that the Project, implemented in accordance with the preferred alternative, and incorporating best management practices

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(BMPs) and protective measures identified in the EA, will not result in any significant environmental impacts. Therefore, the preparation of an Environmental Impact Statement (EIS) is not required. The basis for this determination is described in this FONSI.

Additional information and copies of the Executive Summary of the EA and FONSI are available to all interested persons and the public through the NTIA website (<https://broadbandusa.ntia.gov/funding-programs/documentation-and-reporting>) and the following contact:

Amanda Pereira

Environmental Program Officer  
Office of Internet Connectivity and Growth (OICG)  
National Telecommunications and Information Administration  
U.S. Department of Commerce Room 4874  
1401 Constitution Avenue, NW Washington, DC 20230



## Project Purpose and Need

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### *Purpose*

The purpose of the proposed action is to provide reliable wireless voice and data communications to rural areas of Wood County, Texas and populations in areas surrounding the proposed action site. The enhanced capabilities and reliability of voice and data communications resulting from the proposed action will provide additional economic and educational opportunities and access to previously inaccessible telehealth care services for the surrounding communities.

### *Need*

Rural areas 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, rural communities 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 education, economic opportunities, health, and overall quality of life for current and future members of these communities.

The heat maps included in the Environmental Assessment (EA) show the lack of existing coverage for the surrounding community and the improved coverage that will be provided by the proposed action.

## Project Description

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The following is a description of the Project:

The proposed action is comprised of a single telecommunications facility located within southwestern Wood County, Texas. The proposed action is located on privately-owned land. The Project area is located in an area that does not appear to have been previously disturbed except by agricultural activities. A new 310-foot tall self-supporting lattice telecommunications structure and associated ground-level equipment will be constructed within an approximate 100-foot by 100-foot fenced compound.<sup>1</sup> The proposed facility will include an approximate 81-foot long by 30-foot-wide access/utility easement and a proposed approximate 70-foot-long by 10-foot-wide utility easement.<sup>2</sup>

Construction work for the proposed action will begin with the work areas being cleared and graded as necessary using a mini-excavator / Skid Steer and three 4-foot-diameter caissons being drilled at the proposed tower legs to a depth of approximately 15 feet below ground surface. Additional

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<sup>1</sup> The fenced compound was inadvertently reported as 100 feet by 100 feet in the Proposed Action of the EA at page 4; however, this component will be 75 feet by 75 feet as depicted on the figure in the EA at page 5.

<sup>2</sup> The access/utility easement was inadvertently reported as 57 feet by 30 feet in the Executive Summary of the EA at page 1; however, this component will be 81 feet in length as reported in in the Proposed Action of the EA at page 4.

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excavation activities will include preparation for tower grounding and fiber and power vaults and associated conduits. The standard workday for this Project is expected to last from 7am to 7pm. The skid steer is expected to be required for ten workdays, the excavator is expected to be required for three workdays, and the drill rig is expected to be required for two workdays.

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

Once concrete inspections and strength testing are completed, a crane will be utilized to assemble the proposed lattice tower. The crane will be staged within the proposed Project area and will be required for one workday. Ice bridges, antennas and cables, vaults and conduits, generators, and the grounding systems will then be installed, followed by backfill and compaction activities. Following completion of equipment installation and power and fiber connection, power up and testing activities will be completed. Installation of gravel and landscaping (as necessary), barbed-wire fencing, security hardware, and site signage will mark the completion of construction for the proposed action site. In total, construction activities are anticipated to last between 30-45 days.

The site location and additional site-specific design details are below. Site maps, plans, and photographs are also provided in Appendix A of the EA.

## Analysis of Alternatives

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The recipient's EA includes an analysis of the alternatives for implementing the Project to meet the purpose and need. National Telecommunications and Information Administration (NTIA) conducted a review of the recipient's analysis of alternatives for implementing the Project to meet the purpose and need, including a review of the 'no action' alternative, where applicable. Each alternative was evaluated for impacts against the 'no action' alternative and impacts from other alternatives, as a component of selecting the preferred alternative. The following summarizes the alternatives analyzed in the EA.

### *Preferred Alternative*

The build (proposed action) alternative will consist of the following:

- Installation of a new 310-foot tall self-supporting lattice telecommunications structure within an approximate 100-foot by 100-foot lease area and including:
  - three 4-foot diameter caissons at each of the tower legs;
  - ice bridges, antennas and cables;
  - vaults and conduits;
  - generators; and
  - the grounding systems grounding and fiber and power vaults;
- Installation barbed- wire fencing, security hardware, and site signage;
- Establishment of a proposed approximate 70-foot long by 10-foot wide utility easement;



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and

- Application of temporary and permanent erosion control.

Construction is anticipated to begin in December of 2024 and last for approximately 30-45 working days.

### *No Action Alternative*

The 'No Action' Alternative, which must be assessed in accordance with Federal National Environmental Policy Act, assumes no federal funding is provided by the Middle Mile (MM) Grant Program for the construction of the wireless telecommunications facility. The existing communications infrastructure in areas surrounding the proposed action will continue to operate in their current capacity with no changes to communications capabilities for the surrounding communities and will provide no relief to the unserved or underserved rural communities.

Benefits of the No Action Alternative will include avoiding any potential impacts to the Project site location as a result of construction activities for the new tower facility (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 the area surrounding the Project site.

### *Alternatives*

Other candidate site locations within the search ring were considered; however, the current candidate was selected due to multiple factors including constructability and feasibility based on the clients' needs. No other alternative locations were seriously considered as the proposed action was in an agricultural field that requires minimal groundwork and clearing. In addition, the proposed action location met the location requirements for radio frequency (RF) coverage, and the landowner was agreeable to design parameters and site terms.

### *Alternatives Considered but Eliminated from Further Discussion*

While other candidate locations within the search ring were considered, none of them were rejected for any specific reason. The height and design parameters chosen are standard to address the carrier's needs. Design alternatives will include a proposed monopole design or a proposed guyed-type tower. The monopole design will not satisfy the height required to meet the RF objective for this search ring. A guyed-type tower will include a larger tower footprint, and increased potential for visual impacts and impacts to migratory birds. In addition, there were not any other outside factors, such as zoning or coverage needs, that necessitated a change in the standard design parameters.

## Findings and Conclusions

The recipient's EA analyzed existing conditions and environmental consequences of the preferred alternative, other alternatives, and the No Action Alternative for potential impacts in the major resource areas of Noise, Air Quality (including greenhouse gases [GHGs]), Geology and Soils, Water Resources, Biological Resources, Historic and Cultural Resources, Aesthetic and Visual Resources, Land Use, Infrastructure, Socioeconomics and Environmental Justice, and Human Health and Safety. The results of the analysis are summarized in the table below:



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Resource Area <sup>a</sup>	Preferred Alternative	No Action Alternative
<b>Noise</b>	Less than Significant	No Impact
<b>Air Quality</b> (including greenhouse gases [GHGs])	Less than Significant Impacts with Best Management Practices (BMPs) and Protective Measures Incorporated	No Impact
<b>Geology and Soils</b>	Less than Significant	No Impact
<b>Water Resources</b>	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
<b>Biological Resources</b>	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
<b>Historic and Cultural Resources</b>	No Impact	No Impact
<b>Aesthetic and Visual Resources</b>	No impact	No Impact
<b>Land Use</b>	Less than Significant Impacts	No Impact
<b>Infrastructure</b>	Less than Significant	No Impact
<b>Socioeconomics and Environmental Justice</b>	Less than Significant	Negative Impact
<b>Human Health and Safety</b>	Less than Significant	Negative Impact
<sup>a</sup> This table presents all resources presented in the EA; however, the discussions that follow are focused on the resources where potential impacts were identified.		

The sections that follow provide a brief narrative for those resource areas where there has been a potential impact indicated in the table above or provide a summary of the results of required consultation with the appropriate agency or agencies.

### Noise

The Project will have short-term increases in ambient noise levels during the construction period. Noise created by machinery used during installation will be temporary and localized in nature. To reduce noise impacts, construction activities will occur primarily during weekday daylight hours. The Project will also have intermittent, long-term increases in noise levels due to operation of backup generators in the event of a power outage in the Project location. The backup generators will increase noise levels during test runs to ensure the systems are properly running and during monthly maintenance events. Test runs may occur weekly, bi-weekly, or monthly and last approximately 5 to 12 minutes. The expected A-weighted decibel level (dBA) produced by the generator is 65 dBA during self-tests and 70 dBA during normal operating load. Based on these considerations, no appreciable level of sustained increased noise will result either during or after the construction of the Project.

### Air Quality

Installation of the Project will result in temporary, localized impacts on air quality due to equipment operation and ground disturbing activities. Fugitive dust emissions will be mitigated by wetting and stabilizing exposed soils, minimizing the area of exposed soils, and minimizing traffic across unpaved areas. A short-term minor increase in the use of fossil fuel and associated GHG emissions will occur as a result of Project construction. Following construction, the operation of





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backup generators will contribute minimally to air emissions. Generators will operate for short periods of time in the event of a power outage in the Project location, and during test runs. Only generator engines meeting current U.S. Environmental Protection Agency (EPA) air quality standards will be utilized. The Project is exempt from all Project-level conformity requirements; however, the Project will comply with all state and local air quality regulations. Due to the limited Project scope and utilization of standard BMPs for air quality, there will be no significant impacts on air quality.

### *Geology and Soils*

The proposed action will result in ground disturbing activities measuring less than 0.3 acre and will not occur within soils designated as prime or unique farmlands or farmlands of statewide or local importance. Based on the small scale of soil disturbance required for the proposed action and the lack of significant farmlands, impacts to the quality of soil or surrounding soil and geologic conditions will be negligible.

### *Water Resources*

The Project is not located within or near surface waters. Additionally, the U.S. Fish and Wildlife Service's (USFWS) National Wetlands Inventory indicated there are no wetlands within or in the vicinity of the footprint of the Project site. The Project is not located near a sole source aquifer and approximate depth to groundwater in the Project area is likely greater than 90 feet. A portion of the proposed utility easement will be located within Zone A, which is a Special Flood Hazard Area of the 100-year floodplain where base elevation has not been determined. The proposed telecommunication structure base is not located within a Special Flood Hazard Area. The Grantee has committed to avoiding the placement of equipment within mapped areas of the 100-year floodplain, and utilities placed within the Special Flood Hazard Area will be trenched underground. After trenching, the ground surface will be returned to its original contours so that there will be no change in ground elevation. The Project is not expected to result in significant impact on water resources (including wetlands and other waters, water quality, stormwater runoff, hydrology, or floodplains).

### *Biological Resources*

An Official Species List was generated by the USFWS Information for Planning and Consultation (IPaC) tool and was reviewed for federally-listed and proposed Threatened and Endangered species that may be present in the Project area. The IPaC list contained two federally-listed Threatened species, one Proposed Endangered and one Proposed Threatened species as potentially occurring in the Project vicinity. No critical habitats were identified within the Project site. Seven state-listed species were also identified as potentially occurring in the Project vicinity.

Based on a review of the IPaC, Texas Parks and Wildlife Department (TPWD), and site inspections, the Project site will not provide suitable habitat for federally or state-listed or proposed species with the exception of the Proposed Endangered tricolored bat (*Perimyotis subflavus*). The tricolored bat roosts in clusters of leaves from live or recently dead deciduous hardwood trees. The proposed access easement for the Project will require tree removal, and these trees may provide suitable habitat for the tricolored bat. Clearing associated with the Project will affect approximately 0.01 acre of trees. The tricolored bat winter torpor season is December 15 to February 15 and pup season is May 1 to July 15. Restricting tree-clearing during these periods





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is recommended while the species is proposed for listing and the Grantee will consider them during Project planning; however, restricting tree-clearing during these periods would be required for implementation once any final listing is published and goes into effect. While tree removal may result in a small loss of potential habitat, it is not likely to have a significant effect on the tricolored bat. Further, since the Project site does not contain suitable habitat for other federally or state-listed species there will be no effect on other protected species.

The Grantee has committed to construct the telecommunications tower to conform with the USFWS recommended siting and construction measures to mitigate potential impacts to birds. Further, the Project site location, consisting of grassed pasture and narrow tree line, is not expected to provide quality migratory bird habitat, and the Project is not expected to adversely affect migratory birds. Finally, although no bald eagle nests are known to be present in the Project vicinity, the Grantee would follow guidance in the National Bald Eagle Management Guidelines if a nest is discovered within 660 feet of the Project site.

Based on measures committed to by the Grantee, the Project will have no significant adverse impacts on biological resources.

### *Historical and Cultural Resources*

In December 2023, a Phase I cultural resources survey of the Project's direct area of potential effects (APE) was completed with the purpose of identifying and addressing potential impacts to historic and cultural resources. As a result, no historic properties or previously undocumented archaeological sites were identified within the direct APE. Similarly, background research identified no historic properties or aboveground historic resources within the 3/4-mile APE for indirect, or visual effects on above-ground resources.

On January 10, 2024, the Phase I Cultural Resources Survey Report prepared for the Project was submitted for Section 106 review to the Texas Historical Commission (THC), with the Federal Communications Commission (FCC) identified as the lead federal agency. On February 1, 2024, the THC issued determinations of 'no historic properties affected' for both aboveground and archaeological resources.

On July 30, 2024, the THC was contacted regarding Section 106 review of the Project as an NTIA undertaking. The THC was informed of the NTIA's intent to utilize the Advisory Council on Historic Preservation's (ACHP) *Program Comment to Avoid Duplicative Reviews for the Wireless Communications Facilities Construction and Modification* (Program Comment) for the proposed Project. Since the THC previously reviewed and commented on the Project in February 2024 under the FCC's *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the FCC* (FCC Nationwide PA), a second, or duplicate, review as an NTIA undertaking was not required in accordance with the ACHP's Program Comment.

In accordance with FCC procedures, 16 federally recognized tribes were identified that may attach religious and cultural significance to historic properties. In December 2023, the 16 tribes were notified about the Project via the FCC's Tower Construction Notification System. All Native American Tribes that expressed interest in the Project have either concurred that no known historic properties will be affected, expressed no further interest, or did not respond and



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consultation was concluded consistent with NTIA's procedures. As a result, NTIA's tribal consultation responsibilities under the Section 106 process have been met for the Project.

### *Land Use*

The Project will be constructed on undeveloped land, surrounded by wooded, grassed, and agricultural land. Minimal tree clearing for access to the site is expected, resulting in minimal changes to the overall land use for the larger tract on which the tower will be located, and will result in no changes to surrounding property land uses. Therefore, the Project will have no significant impact on land use.

### *Infrastructure*

The proposed action will require additional energy demands for the wireless facility; however, the overall increase in energy demand during construction and operation of the Project will be within the existing capabilities of local electrical distribution providers. The Project will not require water and sewer infrastructure, and no new public roadways will be required. However, construction activities will result in a minimal increase in traffic on local roadways during the staging and construction. Therefore, the Project will have no long-term impacts on infrastructure.

### *Socioeconomic Resources*

The Project will not displace any homes or businesses, nor will it affect access to them. The proposed action will provide essential infrastructure that will benefit the residents of Wood County by providing voice and data communications to the surrounding community. No environmental justice communities will be crossed by the Project; therefore, the Project will not cause a disproportionately high or adverse effect on minority or low-income communities.

### *Health and Human Safety*

No hazardous waste sites or registered underground storage tanks (UST) were identified within the vicinity of the proposed action. The Grantee will utilize the 811 (call before you dig) prior to ground disturbance and ensure workers operating heavy machinery and equipment are qualified by training or experience. During construction, Occupational Safety and Health Administration (OSHA) safety standards will be enforced for contractors and their employees. Following construction, the tower will be surrounded by barbed-wire fencing that will include gate access secured by a padlock to prevent and discourage public access to the site.

Overall, the Project will result in no adverse impacts to human health and safety and will enhance capabilities and reliability of voice and data communications, which will be beneficial to human health by providing additional economic and educational opportunities and improved access to telehealth care services for Wood County residents.

### *Cumulative Impacts*

As described throughout this Finding of No Significant Impact (FONSI), the Project will not have significant adverse impacts on any of the environmental resource areas evaluated in the EA. As such, no cumulative impacts on the environment are anticipated



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### *Public Comment*

NTIA conducted a public comment period for the EA. The public notice was placed in the **Wood County Democrat**. The notice of the proposal and EA was also posted on NTIA's website for national exposure. The notice described the proposed Project and comment process and provided guidance on where to view the document and federal points of contact. The comment period began on November 13, 2024, and concluded on December 13, 2024. No comments were received.



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## Decision

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NTIA concludes that constructing and operating the Project as defined by the preferred alternative, identified BMPs, and protective measures, will not require additional mitigation. A separate mitigation plan is not required for the Project. The analysis indicates that the proposed action is not a major federal action that will significantly affect the quality of the human environment. NTIA has determined that preparation of an EIS is not required.

Issued on December 17, 2024, by:

**AMANDA PEREIRA** Digitally signed by AMANDA PEREIRA  
Date: 2024.12.17 16:25:00 -05'00'

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Amanda Pereira

Environmental Program Officer  
Office of Internet Connectivity and Growth (OICG)  
National Telecommunications and Information Administration  
U.S. Department of Commerce Room 4874  
1401 Constitution Avenue, NW Washington, DC 20230

