Finding of No Significant Impact

National Telecommunications and Information Administration

Middle Mile Grant Program

CONTENTS

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:	The Towers, LLC
Grant Project Name:	Old Pearson Road (US-MS-5200) – Proposed 211-Foot-Tall Self-Supporting Lattice Telecommunications Structure
Grant Award No.	08-40-MM228
Program Location:	Rankin County, Mississippi

PROGRAM SUMMARY

The NTIA awarded a grant to Zayo Group, LLC, a portion of which was subgranted to The Towers, LLC (Towers), 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 middle mile 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. The Project is called Old Pearson Road (US-MS-5200) – Proposed 211-Foot-Tall Self-Supporting Lattice Telecommunications Structure and activities are scheduled to occur in Rankin County, Mississippi.

The Towers, LLC completed an EA for this Project in March 2025. NTIA reviewed the EA and determined it is sufficient. The EA was posted on the NTIA's Broadband USA (BBUSA) website for a 30-day comment period from April 9, 2025, through May 9, 2025. No comments were received during the comment period. A public notice indicating the availability of the EA for review on the BBUSA website was published in the Rankin County News on April 9, 2025.

The Project includes:

- **Project Activity 1 (Preferred Alternative):** Construction and maintenance of a 211-foot-tall self-supporting lattice telecommunications structure and associated ground-level equipment including a 50kW backup generator within a proposed 75-foot by 75-foot fenced compound which will be situated within an 80-foot by 80-foot proposed lease area, and a 263-foot-long by 30-foot-wide access/utility easement in Rankin County, Mississippi.

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 (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

PURPOSE

The purpose of the proposed action is to improve and enhance reliable wireless voice and data communications to areas of Rankin County, Mississippi. 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 services for the surrounding communities.

NEED

Rural areas such as Rankin County, Mississippi 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.

Current wireless coverage in residential areas to the north, west, east, and south of the proposed action is weak, and without the proposed action, coverage is likely to get worse as demand in the areas is anticipated to increase. The proposed action is needed to offload wireless traffic currently being served by existing on-air macro tower sites to the north, west, east, and south of the proposed action that have been exhausted with heavy usage stemming from massive expansion in customer demand in recent years. The proposed action will improve access to reliable and modern wireless communications capabilities for areas of Rankin County, Mississippi in the vicinity of the proposed action site and allow users to continue to have reliable service over the long term. Benefits to the population will include, but are not limited to, improved communications infrastructure, increased educational and economic opportunities, and better access to healthcare services, including telehealth services.

PROJECT DESCRIPTION

The following is a description of the Project:

The proposed action includes a 211-foot-tall self-supporting lattice telecommunications structure and associated ground-level equipment that will be constructed within a 75-foot by 75-foot fenced compound which will be situated within an 80-foot by 80-foot lease area. The proposed facility will include an approximate 263-foot-long by 30-foot-wide access/utility easement. Ground-level equipment within the compound will include two equipment cabinets and an associated canopy, two utilities H-frames, and a 50-kilowatt (kW) backup generator. The proposed cabinets and generator will be placed on concrete slabs.

Further, two 3-inch underground power conduits will be installed at an approximate depth of 36 inches within the access/utility easement from the proposed compound to a new power pole within the access/utility easement. From the power pole, overhead power lines will extend to an existing power pole located east of Old Pearson Road in order to avoid additional ground disturbance within the right-of-way. Underground fiber will be installed in the access/utility easement within two 2-inch conduits from the proposed compound to a new handhole located where the access/utility easement meets the Old Pearson Road right-of-way.

ANALYSIS OF ALTERNATIVES

The recipient's EA includes an analysis of the alternatives for implementing the Project to meet the purpose and need. 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. 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:

- Construction of a 211-foot-tall self-supporting lattice telecommunications structure and associated ground-level equipment that will be constructed within a proposed 75-foot by 75-foot fenced compound which will be situated within an 80-foot by 80-foot proposed lease area.
- Construction of a 263-foot long by 30-foot-wide access/utility easement.
- Installation of ground-level equipment within the compound including two equipment cabinets and an associated canopy, two utilities H-frames, and a 50-kW backup generator.
- Installation of two 3-inch underground power conduits that will be installed at an approximate depth of 36 inches within the access/utility easement from the proposed compound to a new power pole within the access/utility easement.

- Installation of overhead power lines that will extend from the new power pole to an existing power pole located east of Old Pearson Road.

- Installation of underground fiber in the access/utility easement within two 2-inch conduits from the proposed compound to a new handhole located where the access/utility easement meets the Old Pearson Road right-of-way.

- Application of temporary and permanent erosion controls, including a temporary 1-foot by 100-foot silt fence barrier to the west of the lease area, a 3-foot-wide swale installed within a 5-foot by 90-foot installation area to the south of the lease area, and a 3-foot-wide swale and a 15-foot-long by 12-inch-diameter culvert installed within a 5-foot by 80-foot installation area to the north of the lease area within the access/utility easement.

- Installation of an approximately 30-foot-long by 18-inch-diameter culvert north of the proposed lease area within the access/utility easement.

Construction is anticipated to begin in 2025 and last for approximately 60 working days.

NO ACTION ALTERNATIVE

The 'No Action' Alternative, which must be assessed in accordance with Federal National Environmental Policy Act regulations, 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 CONSIDERED BUT ELIMINATED FROM FURTHER DISCUSSION

Two other candidate site locations within the search ring were considered. The first site location that was considered but eliminated from further discussion was an existing tower located north of the proposed action location. The tallest available co-location height on this tower was 168 feet, which will not satisfy the 200-foot height the carrier required to meet their coverage objectives. The second location that was considered but eliminated from further discussion was a new tower located to the northwest of the proposed action site, within the proposed search ring. This location has a ground elevation approximately 20 feet less than the proposed action location. The tower height required to match the height needed to satisfy the coverage objectives would not have been feasible due to zoning restrictions in that location.

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, Geology and Soils, Water Resources, Biological Resources, Historic and Cultural Resources, Aesthetic and Visual Resources, Land Use, Infrastructure, Socioeconomic Resources, and Human Health and Safety. The results of the analysis are summarized in the table below:

Resource Area[a]	Preferred Alternative	No Action Alternative
Noise	Less than Significant Impacts	No Impact
Air Quality	Less than Significant Impacts with Best Management Practices (BMPs) and Protective Measures Incorporated	No Impact
Geology and Soils	Less than Significant Impacts	No Impact
Water Resources	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
Biological Resources	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
Historical and Cultural Resources	No Impact	No Impact
Aesthetic and Visual Resources	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
Land Use	Less than Significant Impacts	No Impact
Infrastructure	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
Human Health and Safety	Less than Significant Impacts with BMPs and Protective Measures Incorporated	Negative Impact

[a] This table presents all resource conditions presented in the EA within the relevant resource areas; however, the discussions that follow are focused on the resource conditions 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 create 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, relatively minor long-term increases in noise levels due to operation of backup generators in the event of a power outage in the Project location. The expected A-weighted decibel level (dBA) produced by the generator is expected to be 81 dBA during maximum operating load, which would likely only occur during power outages. Additionally, the generator runs a self-test lasting approximately 30 minutes and will occur monthly and produce 67 dBA. Based on these considerations, no significant impacts on noise are expected to occur as a result of Project implementation.

AIR QUALITY

The Project will result in a temporary, localized increase in air emissions during construction due to equipment operation and ground disturbing activities. In order to minimize the generation of fugitive 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) will be implemented. 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 Project will result in ground disturbing activities measuring approximately 0.4-acre. There are no unusual geologic features, known occurrences of important minerals, or known sensitive geologic features present within the Project area. The majority of the Project will not occur within soils designated as prime or unique farmlands or farmlands of statewide or local importance. A small portion of the proposed access/utility easement overlays soil classified as prime farmland; however, this area is currently a dirt drive that will continue to be used as access for the Project. The potential for soil erosion will be addressed through the implementation of erosion and sediment control BMPs. Based on the small scale of soil disturbance that will be required for the proposed action and the use of BMPs, there will be no significant impacts on soil and geologic conditions.

WATER RESOURCES

The Project is not located within or near wetlands or surface waters and is not located within a sole source aquifer area or within a Special Flood Hazard Area of the 100-year floodplain. The anticipated regional groundwater levels at the Project site will be well beneath the extent of any excavation activities. No water withdrawals are proposed as part of Project activities. Where applicable, sediment and erosion control BMPs will be implemented, such as silt fencing or sediment traps, and erosion control mats. The proposed implementation of stormwater management measures are expected to minimize the effects to water resources. Based on the lack of wetlands or surface waters within the Project area and the use of BMPs, the Project is not expected to result in significant impacts on water resources (including wetlands and other waters, water quality, stormwater runoff, hydrology, or floodplains).

BIOLOGICAL RESOURCES

An Official Species List generated from the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool and was reviewed for federally listed and proposed threatened and endangered species that may be present at the Project area. The IPaC list identified three proposed species as potentially occurring in the Project vicinity. No critical habitats were identified within the Project site.

Four state-listed species were also identified as potentially occurring in Rankin County. Based on a review of the information provided by IPaC, Mississippi Department of Wildlife, Fisheries, and Parks (MDWFP), site inspections, and a Natural Resources Review and Natural Resources Review Update, the Project site will not provide suitable habitat for federally or state-listed or proposed species. NTIA has determined that the Project will not jeopardize the continued existence of federally proposed species. A consultation request was submitted to the MDWFP, who responded on October 7, 2022, stating that there are no records of rare, threatened, or endangered species or communities in the vicinity of the proposed cell tower project; however, the MDWFP recommended BMPs be property implemented, maintained, and monitored (particularly measures to prevent or at least minimize negative impacts to water quality).

The Grantee committed to conform to the USFWS recommended siting and construction measures for new towers as described in the USFWS *Recommended Best Management Practices for Communication Tower Design, Siting Construction, Operation, Maintenance, and Decommissioning* to the extent possible. As such, the proposed Project is not expected to adversely affect migratory birds. With the implementation of mitigation measures committed to by the Grantee, the Project will have no significant adverse impacts on biological resources.

HISTORICAL AND CULTURAL RESOURCES

In September 2022, a Phase I Cultural Resources Survey for the proposed action was submitted to the Mississippi Department of Archives and History (MDAH). In October 2022, the MDAH issued a "no cultural resources listed in or eligible for listing in the National Register of Historic Places (NRHP) will be directly or visually affected" determination for above ground and archaeological resources for the Project. Subsequently, two Addendum letters were sent to MDAH in October 2024 and November 2024, including addendums to the Federal Communications Commission (FCC) Form 620, to address changes in the proposed Project design and stating that the tower will now be constructed by The Towers, LLC instead of by Verizon Wireless. No responses were received from the MDAH within the Nationwide Programmatic Agreement mandated 30-day review period.

Eleven federally recognized Tribes were identified that may attach religious and cultural significance to historic properties in the vicinity of the Project site. In August 2022, the 11 Tribes were notified about the Project via the FCC's Tower Construction Notification System. Additionally, these Tribes were provided with updates to the proposed site plans on October 31, 2024, with their review period completed on November 30, 2024. All Tribal responses and requests for information were met, and it was determined that as of November 30, 2024, no further action was required and that NTIA's Tribal coordination responsibilities under Section 106 have been met for this Project.

AESTHETIC VISUAL RESOURCES

The proposed action will include the installation of a 211-foot-tall self-supporting lattice telecommunications tower and support equipment at grade. No sensitive aesthetic or visual receptors are located within the viewshed of the proposed action, thus no adverse impacts to aesthetic and visual resources are anticipated.

LAND USE

The Project will be constructed entirely in previously disturbed areas and removal of mature trees is not expected. This 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. Construction activities will result in a temporary and minimal increase in traffic on local roadways during the staging and construction phases of the project; however, these conditions will end once construction is complete; therefore, the Project will have no long-term impact on infrastructure.

HEALTH AND HUMAN SAFETY

No hazardous waste sites or registered underground storage tanks (UST) were identified within the vicinity of the Project. 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 services for Rankin County residents.

CUMULATIVE IMPACTS

As described throughout this 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.

PUBLIC COMMENT

NTIA conducted a public comment period for the EA. The public notice was placed in The Rankin County News circulations. 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 April 9, 2025, and concluded on May 9, 2025. No comments were received.

DECISION

NTIA concludes that constructing and operating the Project as defined by the preferred alternative with the implementation of the identified BMPs and protective measures will not require additional mitigation. A separate mitigation plan is not required for the Project. The analyses indicate 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 May 19, 2025, by:

AMANDA PEREIRA

Digitally signed by AMANDA PEREIRA
Date: 2025.05.19 18:00:05 -04'00'

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