

**Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form**

I. Basic information

1. Name of federal agency (If multiple agencies, state them all and indicate whether one is the lead agency):

First Responder Network Authority (FirstNet Authority) – Lead Agency

Federal Communications Commission (FCC) – Consulting Party/Cooperating Agency

2. Name of undertaking/project (Include project/permit/application number if applicable):

Red Fish Lake Project

TCNS # 201472 / ECA# W4316

3. Location of undertaking (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

10598 Decker Flats, Stanley, Custer County, Idaho 83278

Private land

The proposed undertaking would not occur on nor affect historic properties located on tribal lands.

4. Name and title of federal agency official and contact person for this undertaking, including email address and phone number:

REDACTED

5. Purpose of notification.

The FirstNet Authority intends to utilize the *Program Comment for Streamlining Section 106 Review for Wireless Communications Facilities Construction and Modification Subject to Review Under the FCC Nationwide Programmatic Agreement and/or the Nationwide Programmatic Agreement for the Collocation of Wireless Antennas* to comply with Section 106 of the National Historic Preservation Act of 1966 (NHPA) requirements for communications facilities being deployed as part of the nationwide public safety broadband network (NPSBN). Pursuant to FCC's 2004 Nationwide Programmatic Agreement (NPA) regarding Section 106 of the NHPA, this documentation is provided to notify the Advisory Council on Historic Preservation (ACHP) of a finding that a proposed undertaking may adversely affect historic properties, and invite the ACHP to participate in a Section 106 consultation.

II. Information on the Undertaking

6. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

AT&T Mobility, LLC (AT&T), is proposing to construct a 199-foot-tall overall height monopole tower telecommunications facility within a proposed 50-foot by 75-foot lease area. Access to the proposed lease area will extend southwest along an existing access drive from Decker Flats/Sheep Drive Road. An additional 12-foot wide access easement will connect the existing access drive to the lease area and a proposed 8-foot wide utility easement will be routed along the existing drive.

The FirstNet Authority, as both an independent federal authority and a licensee of the FCC, must satisfy its own NHPA requirements as well as comply with FCC-promulgated NHPA procedures. Based on discussions with FCC, since the primary purpose for the construction of this tower is to establish adequate coverage of the NPSBN in this area, the FirstNet Authority will assume the role of lead agency for NHPA compliance. The FCC will be a consulting party and will be a signatory to any memorandum of agreement (MOA) that may be executed. Once executed, the MOA would serve as both FirstNet Authority and FCC compliance with NHPA.

7. Describe the Area of Potential Effects:

The FirstNet Authority operates under the FCC's Nationwide Programmatic Agreement for the Section 106 process, which limits the area of potential effects (APEs) for direct effects to the area of potential ground disturbance and any property, or any portion thereof, that will be physically altered or destroyed by the undertaking. The FCC further clarified in direct communication that the APE for direct effects for new tower construction is limited to the proposed lease area, including the access route and utility corridor. The APEs for this project were designated consistent with the FCC definitions.

AT&T's subcontractor completed a field survey to determine that the APE for direct effects is limited to the proposed 50-foot by 75-foot lease area, the 12-foot-wide access easement connecting to the existing access drive to the lease area, and the proposed 8-foot wide utility easement along the existing drive.

The APE for visual effects is the geographic area in which the undertaking has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register of Historic Places (NRHP). The presumed APE for visual effects for construction of new facilities is the area from which the tower will be visible: a. within a ½ mile from the tower site if the proposed tower is 200 feet or less in overall height; b. within ¾ of a mile from the proposed tower site if the proposed tower is more than 200 but no more than 400 feet in overall height; or c. within 1 ½ miles from the proposed tower site if the proposed tower is more than 400 feet in overall height. Due to the height of the proposed tower, the APE for visual effects was a ½-mile radius from the tower site. The Idaho State Historical Society (ID SHPO) requested the APE be enlarged to incorporate the Red Fish Lodge Complex located approximately 1.6 miles southeast of the proposed tower.

8. Describe steps taken to identify historic properties:

CBRE Group, Inc., on behalf of AT&T, prepared the Section 106 Review documentation for the proposed facility. CBRE consulted the ID SHPO records to identify previously identified historic resources. Federal, state, and local agencies and organizations as well as federally recognized tribes were consulted. No historic properties were identified within the direct APE or the original ½-mile APE. Only the Red Fish Lodge Complex was identified following the requested expansion of the visual APE. Members of the general public and other interested parties were afforded an opportunity to participate in and comment on this proceeding pursuant to a notice published in *Idaho Statesman* on April 28, 2020.

9. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

Constructed in 1925, the Redfish Lake Lodge Complex is located on the North Shore of Redfish Lake, approximately six miles to the south of Stanley, Idaho. The Redfish Lodge first began in 1913 as a homestead owned by Bernard D. Horstman. The homestead included a small cabin and later a small tourist resort that included a hotel and boat docks operated under special use permits by the USDA Forest Service. Between 1928 and 1931, Horstman's small resort expanded significantly through his partnership with Robert W. Limbert. Limbert, known in Idaho history as a naturalist and tourism promotor, leased the land from Horstman and constructed most of the buildings that encompass the historic core of the Redfish Lodge Complex. Limbert's constructed included a store, gas station, ice house, boat house, and cabins, as well as major additions to Horstman's cabin to form the main lodge of the resort.

Following Limbert's death in 1933, various investors owned the property. The lodge saw increased tourism and once functioned as a camp for Civilization Conservation Corps (CCC) members who worked on environmental construction projects in the Sawtooth region. Post-WWII development at Red Fish Lodge included the construction of numerous buildings and trailer sites with sewer hookups and a new general store. Permanent buildings including more rental cabins and restrooms were added in the later part of the twentieth century, while several of the historic structures were removed or remolded including the store and main lodge. The Redfish Lodge Complex is eligible for listing in the National Register of Historic Places and is significant for its role in the recreational development of the Sawtooth region and for its association for Robert W. Limbert. The historic core of Redfish Lodge still contains several of the structures constructed under Limbert's direction including the lodge and several ancillary buildings and cabins which are significant examples of vernacular architecture associated with early recreational development.

10. Describe the undertaking's effects on historic properties:

The ID SHPO requested that the APE be enlarged to incorporate the NRHP-eligible Redfish Lodge Complex. Based on the height of the tower, the tower is expected to be visible within various areas of the historic property. Photo simulations of the tower from the historic property was created by AT&T's consultant. The photo simulations utilized the proposed tower's height and the topography and vegetation heights in the vicinity of the proposed tower and historic property to indicate areas where there may be visibility of the proposed tower.

The vegetation is not tall enough in all areas to provide significant screening when viewing the tower from a distance at the historic property; however, vegetation at the historic property does reduce the visibility of the tower from some vantage points.

Pursuant to 36 CFR Part 800.5, the ID SHPO applied the criteria of effect to the proposed project. Based on the information received, the ID SHPO determined that the integrity of the historic property's setting and feeling would be adversely affected by the proposed project. In an attempt to avoid the adverse effect, ID SHPO recommended that AT&T use a monopine in place of a monopole, since height reduction was not an option. AT&T, in consultation with the Idaho Department of Lands (IDL), determined that the monopole is the best solution for the location since the monopine would be visible in other areas outside the location where historic properties are located. The consulting parties concurred with the determination that the proposed project within the viewshed of the historic property constitutes an adverse effect.

11. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

Please see the official *Alternatives Analysis* for a complete discussion. The applicant, AT&T, provided documentation demonstrating the need for the proposed tower as well as detailing the site acquisition process. Further, they documented their measures to avoid, and/or minimize, the adverse effects to historic properties. The documentation includes a letter from an RF engineer outlining the need for the proposed tower at the proposed tower height, as well as propagation maps documenting "before" and "after" coverage. To avoid or reduce adverse effects to historic properties, AT&T considered other properties within the vicinity that may be available. No private property was found within the search rings, and the best-coverage search rings were located within United States Forest Service (USFS) boundaries. However, USFS did not approve of a telecommunications facility to be constructed at any of the USFS locations identified as suitable for meeting AT&T and the FirstNet Authority's needs for telecommunications facility development. Beyond the identified USFS locations, the next ranked suitable facility site was the currently proposed site location, which is located on a parcel owned by the IDL. This location was considered advantageous because it already contained an existing 100-foot tall monopole telecommunications facility, owned by Custer Telephone.

At this proposed location, the various technologies to be installed on the tower would require antennas at a centerline height of 195 feet or higher above the ridge line-of-site to reach coverage objectives. Three additional locations on the west side of the proposed IDL parcel were reviewed that would have allowed for the construction of a shorter structure by 25 to 45 feet, as they are higher in elevation, closer to the ridgeline. However, these locations were not chosen as they would have a greater impact on the area by requiring the construction of $\frac{1}{4}$ to $\frac{3}{4}$ miles of new infrastructure, roads, and power runs.

Upon establishing a site location, AT&T first attempted to utilize the existing Custer Telephone facility to accommodate the FirstNet facility rather than constructing a new,

separate facility. AT&T explored collocating on the existing 100-foot-tall Custer Telephone tower or restricting the height of the proposed FirstNet tower to match the height of the existing tower. Unfortunately, AT&T's engineers determined that a 100-foot-tall structure would not support necessary coverage objectives. To accommodate the height requirements and avoid constructing a second tower at the site, AT&T proposed extending the height of the Custer Telephone tower so that only one tower would be necessary to support Custer Telephone and FirstNet. Custer Telephone declined, resulting in the need for the construction of a new tower at this location to support the FirstNet network.

As reducing the tower height or relocating the tower while maintaining coverage is not possible, ID SHPO requested that AT&T and the IDL consider a monopine instead of a monopole. The IDL has rejected the monopine tower design, determining it as more visually intrusive than the monopole design. Thus, no alternatives exist for the construction of a new tower. Based on the documentation provided by AT&T, the current site selection as proposed is the most feasible option in order to meet coverage objectives while avoiding potential siting issues.

12. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

AT&T's consultant conducted consultation with various interested parties, such as the ID SHPO, USFS, national, state, and local organizations and government, and six federally recognized tribes. AT&T's consultant also posted a copy of the legal notice regarding the proposed undertaking in *The Idaho Statesman* on April 28, 2020. Parties interested in the proposed project have been included as consulting parties (FCC, USFS, ID SHPO, IDL, Idaho Conservation League, and Sawtooth Interpretive and Historical Association). No tribes have expressed an interest in proposed project.

III. Optional Information

13. Please indicate the status of any consultation that has occurred to date. Are there any consulting parties involved other than the SHPO/THPO? Are there any outstanding or unresolved concerns or issues that the ACHP should know about in deciding whether to participate in consultation?

As discussed above, AT&T's consultant conducted consultation with various interested parties, such as the ID SHPO, USFS, national, state, and local organizations and government, and six federally recognized tribes.

AT&T's consultant has received confirmation from ID SHPO that they are satisfied that the applicant considered effects on historic properties and made every effort to avoid, reduce, and minimize effects. AT&T's recommendations for a reasonable mitigation strategy have been discussed with and presented to the ID SHPO and interested consulting parties. Representatives from the ID SHPO, IDL, USFS, the Sawtooth Interpretive and Historical Association, and the Idaho Conservation league have also been involved with the mitigation discussions.

All other parties initially consulted have either not responded or stated that they do not have an interest in the proposed undertaking; however, those that have not responded were given the opportunity to comment and were reengaged after an adverse effect to the historic property was identified.

AT&T's consultant also posted a copy of the legal notice regarding the proposed undertaking in *The Idaho Statesman* on April 28, 2020. As of the date of this submission packet, no comments regarding that notice had been received. On July 2, 2020, a Petition for Environmental Review was submitted by Advocates for the West on behalf of the Sawtooth Historical and Interpretative Association and Idaho Conservation League (see the *Alternatives Analysis* for a copy of the petition). Although the petition did not specifically discuss issues related to the historic property, the petition requested that the FirstNet Authority conduct an environmental review. Since the petition, the FirstNet Authority has determined that an environmental assessment will be required for the proposed project as part of the National Environmental Policy Act (NEPA) process.

The FirstNet Authority does not have any other outstanding or unresolved concerns or issues that the ACHP should know about in deciding whether to participate in consultation for this undertaking.

14. Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

With ID SHPO's concurrence that the proposed undertaking has the potential to adversely affect the historic property, the FirstNet Authority has consulted and reengaged interested parties. The FirstNet Authority plans to notify the public of the adverse effect to the historic property by publication in a local newspaper of general circulation as well as posting the undertaking information on the Environmental Page of the FirstNet Authority website.

15. Is this undertaking considered a "major" or "covered" project listed on the Federal Infrastructure Projects Permitting Dashboard or other federal interagency project tracking system? If so, please provide the link or reference number:

The undertaking is not considered a "major" or "covered" undertaking listed on the Federal Infrastructure Projects Permitting Dashboard or other federal interagency project tracking system.