

LIMITED NEPA - COLLOCATION REQUIREMENTS & THE NATIONWIDE PROGRAMMATIC AGREEMENT



LIMITED NEPA REVIEW/CHECKLIST ITEMS

For antenna collocations and rooftop/building mounting, the FCC regulations call for RF exposure assessment and assessment of a facilities effect on historic resources listed in or eligible for listing in the National Register of Historic Places (NRHP). The two criteria taken together are typically referred to as a “Limited NEPA Review” or simply, “Limited NEPA.” To be NRHP eligible, historic sites and structures must generally be 50 years old or older.

WHAT IS THE NATIONWIDE PROGRAMMATIC AGREEMENT (NPA)?

RF Exposure is typically not a concern for collocation on existing antenna structures, but becomes more of a concern for rooftops and other building mounts. Further, the historical assessment portion of the Limited NEPA review has been streamlined by the Nationwide Programmatic Agreement for the collocation of Wireless Antennas signed into effect on March 16, 2001 (NPA). The Agreement is between the State Historic Preservations Officers (SHPOs), the FCC, and the Advisory Council on Historic Preservation. The NPA contains specific criteria for determining when an effect is present or when more detailed historical assessment, in the form of an individual SHPO or Section 106 Review may be required.

IS COLLOCATION WITHOUT SHPO REVIEW ACCEPTABLE?

To be legally eligible for Limited NEPA review under the NPA, antenna structures that were not reviewed under processes and procedures outlined in the regulations implementing Section 106 of the National Historic Preservation Act must have reached their total built height on or before March 16, 2001. In general, adding 10% to the structure, or a 20-foot extension, whichever is greater is acceptable for antenna structures that underwent Section 106 Review or for structures built on or before March 16, 2001. Mounting on buildings and other structures that are not themselves listed in or eligible for listing in the NRHP or are not located in or within 250 feet of an NRHP listed district is also acceptable.

ECA has developed Proprietary checklists for Limited NEPA assessment. These checklists address every aspect of the NPA. ECA can typically complete the Limited NEPA review without visiting the site. Therefore a low cost and fast turnaround time is achieved.

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ECA has completed more than 4,000 projects at over 1,800 telecommunications sites since 1989. Our typical turnaround time for limited NEPA reviews is 5 to 7 working days. Please call Marvin Webster of ECA at (770) 667-2040 x101 to learn more about the FCC NEPA requirements.

ECA is an environmental and geotechnical consulting and engineering firm with a 20-year track record of excellent service to clients. ECA attributes its success to providing timely and innovative services and solutions with a persistent focus on the objectives of clients.

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Atlanta, GA — (770) 667-2040 • Asheville, NC — (828) 505-0755 • www.eca-usa.com