

COLLOCATION REQUIREMENTS & THE NATIONWIDE PROGRAMMATIC AGREEMENT



COLLOCATION 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 and not encompassing the remaining FCC NEPA categories, 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, but 45 years is used as a review standard.

WHAT IS THE COLLOCATION NATIONWIDE PROGRAMMATIC AGREEMENT (COLLOCATION NPA)?

RF Exposure is typically not a concern for collocations 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 (Collocation NPA). The Agreement is between the State Historic Preservation Officers (SHPOs), the FCC, and the Advisory Council on Historic Preservation (ACHP). The Collocation NPA contains specific criteria for determining when an effect may be present or when a 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 NEPA review under the Collocation NPA, antenna structures that were not reviewed under

processes and procedures outlined in the FCC regulations implementing Section 106 of the National Historic Preservation Act (NHPA) must have reached their total built height on or before March 16, 2001. In general, a one-time addition of 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 non-tower 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, provided that no pending environmental review by the FCC is ongoing and that the tower owner has not received information of a complaint from the FCC that the collocation has an adverse effect on a Historic Property.

ECA has developed Proprietary checklists for Collocation NEPA assessment. These checklists address every aspect of the Collocation NPA. ECA can typically complete the Limited NEPA review without visiting the site. Therefore a low cost and fast turnaround time is achieved. Our typical turnaround time for Collocation NEPA reviews is five to seven working days.

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ECA has completed thousands of NEPA projects at communications facilities since 1989. If you have questions about the FCC NEPA requirements, please call Marvin Webster of ECA at (770) 667-2040 x101 or email marvin.webster@eca-usa.com.

ECA is an environmental, cultural resources, and geotechnical consulting and engineering firm with a proven 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 customers.