



United States Department of the Interior

NATIONAL PARK SERVICE
GRAND CANYON NATIONAL PARK
P.O. Box 129
Grand Canyon, AZ 86023



IN REPLY REFER TO:

1.A.2 (GRCA 8217)

JUL 23 2019



Ms. Kathryn Leonard
State Historic Preservation Officer
1100 W. Washington Street
Phoenix, Arizona 85007-2935

RE: Initiation of Section 106 for Telecommunications Plan, Grand Canyon National Park

Dear Ms. Leonard:

In accordance with the Advisory Council on Historic Preservation (ACHP) regulations, 36 CFR Part 800 Protection of Historic Properties, and the National Environmental Policy Act (NEPA), the National Park Service (NPS) is initiating Section 106 and NEPA consultation for an undertaking, the development of a Telecommunications Plan Environmental Assessment (EA) for Grand Canyon National Park (park). The Section 106 consultation will follow the standard process identified in 36 CFR Part 800.3 through 800.5.

Existing telecommunications, including cellular, Internet/wireless, two-way radio, and data networks, are severely lacking within developed areas of the park and are insufficient to support visitors, park operations, and the operations of park partners including concessioners, non-profits, tribes, a public school, a clinic, a utility company, and other local and federal law enforcement agencies.

The NPS is developing a telecommunications plan/EA to address this issue. The plan/EA would identify appropriate types and locations of telecommunications infrastructure and services within the park through the future construction, operation, and maintenance of various types of infrastructure including telecommunications towers and associated equipment, small antenna, and fiber optic cable within existing developed areas of the park. A Telecommunications Plan project page has been established in the NPS Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/GCTelecommunications>) where documents will be available for review and comment. The PEPC website is provided as an additional resource for you. We will continue to send you documents for your review, as is our usual practice.

We are also initiating NEPA and Section 106 consultation with the park's traditionally associated tribes for this undertaking.

Potential effects to historic properties include the visibility of telecommunications towers from historic districts and structures, installation of antenna on or inside historic structures, and ground disturbance from installing conduit and fiber optic cable below ground.

After applying the criteria of adverse effect in accordance with 36 CFR Part 800.5, the NPS believes that the effects on historic properties cannot be fully determined before the undertaking is approved (i.e., the signing of the Finding of No Significant Impact for the EA). The NPS would prepare a programmatic agreement (PA) for this undertaking in consultation with SHPO, the traditionally associated tribes, and the Advisory Council on Historic Preservation (if the ACHP chooses to participate) in accordance with 800.14(b)(1)(ii). The PA would record the terms and conditions agreed upon to continue Section 106 consultation for this undertaking. There is no existing park agreement document that could be amended to address this undertaking.

The PA is needed because the undertaking is currently in the conceptual phase with general areas identified for implementation and construction, which will occur over the next five to ten years and beyond. For these reasons the effects on historic properties cannot be fully determined at this time.

We seek your comments on the undertaking as described in the Initial Assessment of Effect and our intent to prepare a PA. We will continue to consult with you pursuant to 36 CFR Part 800.3-5, as we develop the plan/EA. If you have any questions regarding this project, please contact Catherine Lentz, Section 106 Coordinator, at 928-638-7327, catherine_lentz@nps.gov.

Sincerely,

Acting for

Woody Smeck
Acting Superintendent

Enclosures:

Maps
Photos

CONCUR

Mary Ellen Walsh 8/15/19
Arizona State Historic Preservation Office

please see comments on email



Lentz, Catherine <catherine_lentz@nps.gov>

Re: [EXTERNAL] Telecommunications Plan; SHPO-2019-1443(149702)

1 message

Mary-Ellen Walsh <mwash@azstateparks.gov>
To: "Lentz, Catherine" <catherine_lentz@nps.gov>

Thu, Aug 15, 2019 at 8:57 AM

sorry. Delete my statement about concurrence with adverse effect - that's why I only used the "Concur" stamp rather than "Adverse Effect" stamp.
Sorry!

Mary-Ellen Walsh, M.A., RPA
Cultural Resources Compliance Manager

Note: Please use our new azshpo@azstateparks.gov email to initiate consultation!

Arizona State Historic Preservation Office

1100 W. Washington Street

Phoenix, AZ 85007

602.542.7120

[mwash@azstateparks.gov](mailto:mwalsh@azstateparks.gov)

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On Thu, Aug 15, 2019 at 8:52 AM Lentz, Catherine <catherine_lentz@nps.gov> wrote:

Hi Mary-Ellen, I have a question about the adverse effect concurrence. In our letter to SHPO we said "the NPS believes that the effects on historic properties cannot be fully determined before the undertaking is approved (i.e., the signing of the Finding of No Significant Impact for the EA). The NPS would prepare a programmatic agreement (PA) for this undertaking in consultation with SHPO, the traditionally associated tribes, and the Advisory Council on Historic Preservation (if the ACHP chooses to participate) in accordance with 800.14(b)(1)(ii)."

Your reply was "SHPO concurs with the Adverse Effect finding and need for a PA." Does this mean that SHPO believes there is a potential for adverse effect? If this is the case, then we could say something like "while the effects on historic properties cannot be fully determined before the undertaking is approved, there is a potential for adverse effect. The NPS would prepare a programmatic agreement (PA) for this undertaking in consultation with SHPO, the traditionally associated tribes, and the Advisory Council on Historic Preservation (if the ACHP chooses to participate) in accordance with 800.14(b)(1)(ii)." Thanks. Catherine

Catherine Smith Lentz
Planning, Environment, and Projects
Grand Canyon National Park
Ph #: 928-638-7327
Address: National Park Service
[1824 S. Thompson St., Suite 200](https://www.nps.gov/gcnp/visiting/index.htm)

Flagstaff, AZ 86001



On Thu, Aug 15, 2019 at 8:22 AM Mary-Ellen Walsh <mwalsh@azstateparks.gov> wrote:
SHPO concurs with the Adverse Effect finding and need for a PA.

Visual simulations will be an important part of this process, and we would like to see the design plans as they are developed. As always, we would like to be kept informed on Tribes' concerns.

Also, as I mentioned previously, I already received one phone call from the public, who would like to know if there will be any public meetings as part of the 106 process, outside of NEPA. It may be something to consider.

Thank you,

Mary-Ellen Walsh, M.A., RPA
Cultural Resources Compliance Manager

Note: Please use our new azshpo@azstateparks.gov email to initiate consultation!

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