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Environmental Assessment

Horn Mountain Communication Tower

Talladega Ranger District, National Forests in Alabama
Talladega County, Alabama

T20S R5E S12

For Information Contact:
Gloria Nielsen
1001 North Street Talladega, AL 35160

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INTRODUCTION

Purpose and Need for Action ---

The purpose of this project is to construct a structurally sound telecommunications tower that will provide adequate communications for the safety of Forest Service employees, forest visitors, and permittees. The proposed tower will provide communication needs for the Forest Service and Alabama Forestry Commission. This action is needed because clear communications are essential for the safety of our employees and the public as they are involved in daily activities which include firefighting, tree felling and other hazardous duties. This action responds to the goals and objectives outlined in the 2004 Revised Land and Resource Management Plan for the National Forests in Alabama (Forest Plan) and its accompanying Environmental Impact Statement (EIS) and Record of Decision (ROD), and helps move the project area towards desired conditions described in that plan (5.B.Designated Communications/Electronic Sites). 5.B. Designated Communications/Electronic Sites: These designated areas are managed to minimize adverse impact on other resources. Where possible, existing sites are expanded as needed rather than creating additional areas. New equipment should be as inconspicuous to the surrounding terrain as possible. These areas are managed to retain low-growing vegetation, which conforms to the safe operating requirements of the utility and which reduces surface water runoff and erosion. Recreation is discouraged at these sites. Goal 30 Manage areas with special paleontological, culture, or heritage characteristics to maintain or restore those characteristics. Standards -- FW-113 – Protection of firefighters and the public is the first priority in all fire management actions. FW-148 – Coordinate inventory, evaluation, nomination, protection, enhancement, and interpretation procedures with the Alabama State Historic Preservation Officer (SHPO), Advisory Council on Historic Preservation (ACHP), and Tribal Historic Preservation Officer (THPO) as necessary before project decisions. FW-149 – All coordination relating to the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800) will also tier to any programmatic agreements, MOUs, MOAs or other agreements between the Forest and SHPO.

Proposed Action ---

The Forest Service proposes to erect a 60 to 100 foot self-supporting tower with a two foot triangular base which will meet current safety standards, construct a fence, move powerline and cut about ten trees.

Issues

The Forest Service identified the following issue during scoping:

Horn Mountain Fire Tower is determined eligible for the National Register of Historic Places (NRHP). The location of the proposed new telecommunications tower is adjacent to the Horn Mountain Fire Tower. The area was constructed as a

U.S. Forest Service fire tower lookout complex in 1937. At present it meets Criteria A, C, and D for the NRHP, and the construction of the new communications tower may be considered an adverse effect on this historic site.

ALTERNATIVES, INCLUDING THE PROPOSED ACTION

Alternative 1

The Proposed Action

We propose to erect a 60 to 100 foot self-supporting tower with a two foot triangular base which will meet current safety standards, construct a fence, move the powerline and cut about ten trees. The existing communications control room should be adequate for use when remodeled. The bottom 60 feet of a 100 foot tower is planned for placement however the tower height may be increased if communications are impaired. The approximate size of the concrete pad is seven foot square by six foot deep however if bedrock is encountered, the surface width of the pad would increase. The project area is located at Township 20 South Range 5 East Section 12 and will be accessed by existing roads.

Alternatives Considered but Not in Detail

Alternative 2

We considered an alternative to restore the Horn Mountain Fire Tower and create a platform/catwalk so telecommunication employees would be safer and secure for putting up antennas. A mitigation plan would not be needed since the tower is currently used for communications. The safety officer for our Chief Information Office (telecommunications) still has safety concerns even if a platform/catwalk is constructed, due to the precarious position of putting antenna on the tower legs so this alternative was not considered further.

Alternative 3

We considered building a new tower about 75 feet south of Horn Mountain Fire Tower. This alternative would require constructing a new building and fence. We would move the power line, since it should not be run underground for that distance. A mitigation plan would still be needed. The location would require an 80+ foot tower due an elevation of about 1900 feet. This alternative would be more costly, would require expansion of the existing communication site through a Forest Plan amendment and would still have adverse impacts to the fire tower so it was not considered in further detail.

Alternative 4

We considered placing a telecommunications tower adjacent to the American Tower about one mile north of Horn Mountain Fire Tower. This location would have reduced communication coverage to the east due to the wide ridge at that location. It would require a Forest Plan amendment to designate this as a communication site. This alternative was dropped because it would require construction of a building, fence, powerline extension and would require a 200+ foot tower due to 1700 foot elevation and to obtain needed coverage.

Alternative 5

We considered using the Clay County Emergency Management Agency tower at Bulls Gap off national forest system road 600M, about 6 miles south of Horn Mountain Fire Tower. This location is an existing communications site with a 60 foot tower. This location was dropped due to reduced communication coverage due to the wide ridge which would require a 200+ foot tower (due to the 1720 foot elevation) It would also require construction of a building, fence, and possible powerline extension.

Alternative 6

We considered using a recently acquired Microwave Tower on Rebecca Mountain. This alternative was dropped since communications east of Horn Mountain would be totally blocked, unless we constructed an enormously tall tower. This location is at a 1429 foot elevation. It would also require a Forest Plan amendment to designate this as a communications site.

Alternative 7

We considered using the location approved by the Alabama State Historic Preservation Office in the 1996 located about 250 feet southwest of Horn Mountain Fire Tower. This alternative would require a Forest Plan amendment to designate as a communications site. This alternative was not considered in detail since it would require constructing a 200+ foot tower (due to elevation of about 1760 feet), constructing a new building and fence, and relocating the existing powerline, since it should not be run underground for that distance. A Mitigation Plan would be needed due to impacts to the fire tower.

Alternative 8

We considered using the location about 100-150 feet southwest of Horn Mountain Fire Tower, which was reviewed and dropped in 2009 as a potential location for a Talladega County Emergency Management Agency tower. This location is part of the existing communications site. This alternative was not selected since it would

require at least a 100+ foot tower (due to 1880 foot elevation)., power line relocation, a new building, and a new fence. This is not the optimal site for the communication tower and would still have an adverse effect on the fire tower requiring a mitigation plan.

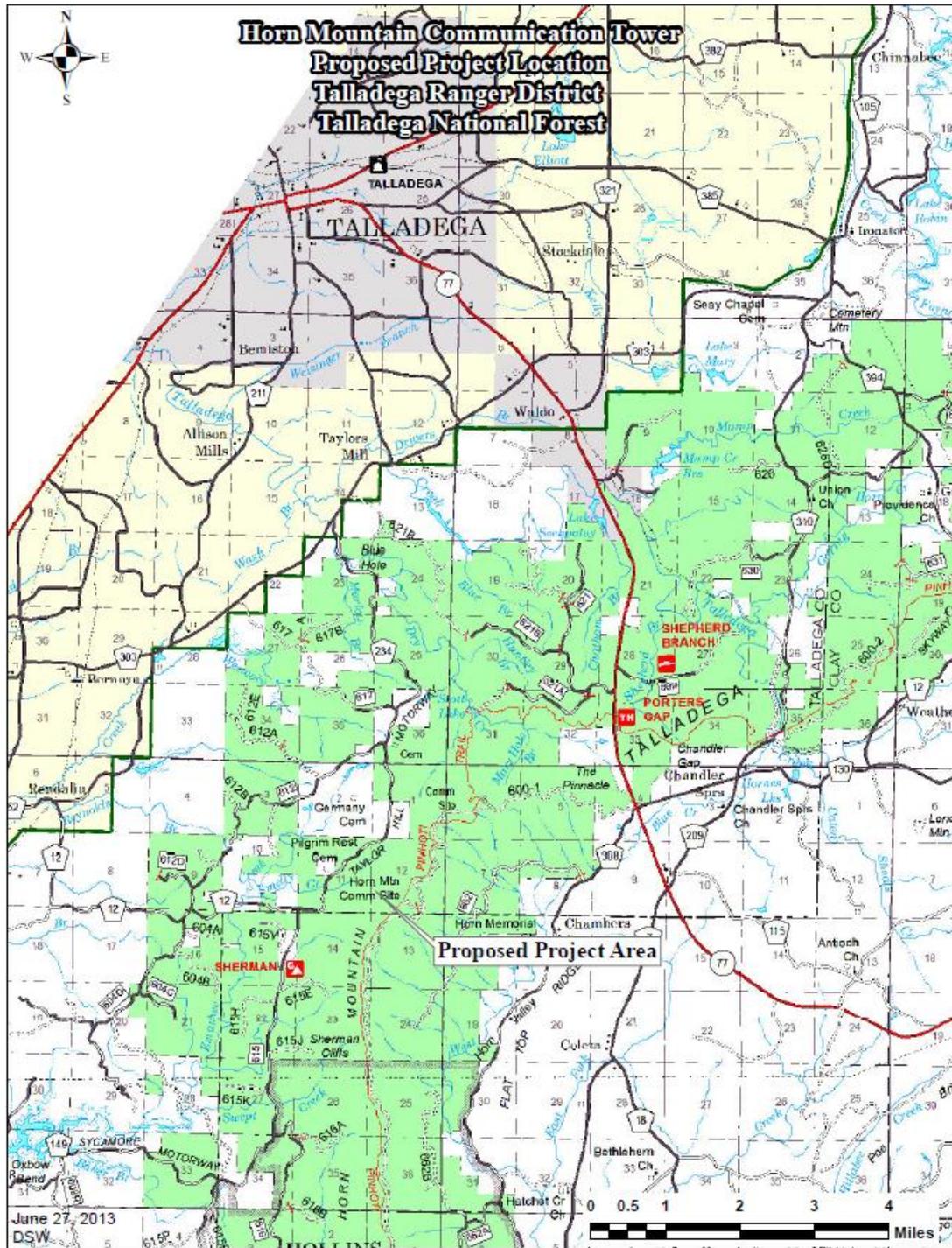


Figure 2. Proposed Project Area Horn Mountain Communication Tower.

Project Design Criteria

The Forest Service is collaborating with the Alabama State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation to review, reduce or avoid project related impacts to the NRHP eligible Horn Mountain Fire Tower. As a mitigation to lessen the effect on aesthetics of the fire tower, the proposed tower will not exceed 100 feet in height leaving the fire tower as the dominant structure along that section of Horn Mountain.

Project Issue Effects

No Management Indicator Species (MIS) are specifically identified for the project area since it is located on a high ridgetop in a highly disturbed area with nonnative trees (white pine) as the predominant overstory with poison ivy and Virginia creeper for understory. A plant and animal survey was conducted in May of 2013 and no proposed, endangered, threatened, sensitive, management indicator species, or demand species were found. There is also no critical habitat identified near the project area. Given the highly disturbed nature of this small site (less than ¼ acre) with a mostly non-native overstory present, no additional analysis is needed for effects determinations for these species. Constructing the communications tower will have no effect on any endangered, threatened, sensitive, management indicator or demand species or their habitat on the Talladega Ranger District.

Effects to safety and the NRHP eligible Horn Mountain Fire Tower are discussed under other sections in this document.

Public Health or Safety

Implementation of the proposed action of erecting the tower will insure continued communications which should provide for the safety of employees, both federal and state, and the public. The Forest Service antenna currently mounted to the fire tower will not be replaced if damaged due to concerns with climbing and working off the fire tower in its current condition. Tests have been conducted by placing an antenna at 20 feet in height near the base of the tower and communications were severely diminished due to reduced coverage. A structurally sound tower at least 60 feet tall in this location is critical for communications on the south end of the Talladega Ranger District. Communications in this area are necessary to ensure the safety of the district employees and the local community due to poor to non-existent cell phone coverage over large portions of the Talladega Ranger District. Radio communications are used for employee check in/check out; coordinating daily work; giving weather updates; conducting emergency responses, search and rescue operations and law enforcement communications; conducting prescribed burns; and coordinating wildfire response and operations. Without an adequate and reliable

communications tower, many of these activities would not be possible on the Talladega Ranger District and the general safety of the public and the personnel that work on the district could be compromised.

This is one of two communications sites on the district and is the optimal location on the district for this communications tower. The other site is lower in elevation and does not give as comprehensive signal coverage.

In addition, a potential hazard exists with the current state of the tower. Contrary to signage and the presence of a locked gate and fence, the public is accessing the tower itself. Previously, the decision was made to remove the bottom flight of stairs to protect the public and prevent accessing the tower. Rather than eliminate climbing, the public continues to climb the tower in a less safe manner. The maintenance activity of replacing the bottom flight of stairs and deteriorated boards will improve safety for unauthorized uses.

Unique Characteristics of the Geographic Area

The project area is located on a high ridge top with gated high-clearance vehicle access. The Horn Mountain Fire Tower, built in 1937 by the Civilian Conservation Corps, is eligible for the National Register of Historic Places. The Horn Mountain shelter was refurbished in 2005 and associated fieldstone clad overlooks and a latrine are onsite and available to view by foot traffic. The Pinhoti Trail is in close proximity and this site does receive hiking visitors.

Quality of the Human Environment

Temporary aesthetic impacts could occur while workers and equipment are present. These impacts could affect the visual quality of the area for forest visitors even though the visual quality objective is moderate for communication sites. Short term noise disturbance could be generated from work being conducted onsite. Beneficial impacts should be noticed afterwards in response to the reconstruction and refurbishment of the historical aspects of the project area established through a mitigation plan with Alabama SHPO. There will be no restriction on recreational use of the project area during work or afterwards as long as visitors stay outside the construction zone and fenced area. However, recreational use is discouraged at communication sites.

Uncertainty

There are no known risks which effect the human environment. The radio frequencies used have no adverse effects to humans in the vicinity.

Precedent for Future Actions

The current action under proposal, erection of a new communications tower on a NRHP eligible site, should provide a positive precedent for future actions in areas that contain a historical fire tower. Various groups and agencies have joined together for consultation as to whether there would be any type of adverse effect to the site, and came to the conclusion that it would be an adverse effect. To lessen that impact

the NFsAL has invited all interested parties, including specialists within the NFsAL, to submit ideas for the mitigation of those effects. This consultation should make all the parties aware that future actions need to be scrutinized for adverse effects to historical sites.

There are currently 14 Fire Towers on the NFsAL. Of the 14, six are adaptively reused as communications sites for the forests. In the database of record, the total deferred maintenance cost for all fire towers is approximately \$337,000. As a result of this action, and in conjunction with the need to address deferred maintenance backlogs, future actions could be proposed for the remaining 13 fire towers.

Cumulative Effects

No environmental effects should occur outside the area of the proposed project and the beneficial effects of safe communications will be widespread. No future projects are planned for the immediate area around the proposed site except planned maintenance and restoration of the cultural resources. The maintenance and restoration efforts will be in concurrence with the Alabama SHPO and other interested parties as needed.

Cultural Resources

The area under proposal for the erection of a new communications tower was landscaped by the U.S. Forest Service from 1936-1938 as the location for the Horn Mountain Fire Tower. An African-American junior enrollee company of the Civilian Conservation Corps (CCC) constructed the tower. The fire tower is a 100-foot steel tower with a 7x7-foot steel cab. Also extant in the project area are structures associated with the fire tower complex. At present there is a men's and women's toilet, a picnic shelter that was refurbished in 1957 and 2005, and several fieldstone masonry overlooks on the western face of Horn Mountain, adjacent to the fire tower.

A 1997 Environmental Assessment contained a detailed section on the Horn Mountain Fire Tower complex due to an initiative then to install new communication towers across the Talladega National Forest. An outside cultural resource management contractor, New South Associates of Atlanta, GA, was hired to perform an assessment of cultural resources for that Environmental assessment. Their conclusion was that the Horn Mountain Fire Tower complex was eligible for listing on the NRHP. The Alabama SHPO concurred with their findings in 1997. Due to this potential designation, a limited mitigation plan was put into place and a compromise was made concerning the placement of new communication towers. In lieu of building a new tower on the potentially eligible site, an agreement was struck with Alabama SHPO, interested tribes, other interested parties, and the National Forests in Alabama to place additional communication antennas on the fire tower itself. This was a decision that was able to serve the communication needs of the Talladega Ranger District staff, as well as, lessen the adverse aesthetic impact to the NRHP eligible site.

Currently a similar agreement cannot be reached with the Chief Information Office (CIO) due to safety issues with the tower. There is merit to their complaint. In the

years between 1997 and 2013, general maintenance on the fire tower such as the replacement of wooden steps was deferred due to budget constraints resulting in several safety issues with accessing the existing antennas on the fire tower. This lack of maintenance could be considered an existing adverse effect as described in 36 CFR 800.5(vi). At present the CIO would prefer an independent tower where a maintenance routine could be established. This new tower could be considered a new adverse effect under 36 CFR 800.5(v).

This new 60 to 100 foot tower (the height has not been determined at this writing) will be placed within 15 meters of the fire tower to utilize the existing communications control room. Thus it may create a visual impact to the fire tower that could be considered aesthetically unappealing. However, no part of the fire tower complex will be destroyed in the construction of the new tower. Some trees may need to be cut for placement of the communications tower and to aid in radio signal reception. The majority of trees at this complex are white pine, which are outside their natural range in Alabama.

Although some interested parties may consider the new construction a devastating adverse effect to the complex that may not necessarily be the case. Archaeological sites are considered the most interesting when they are complex and subject to evolution. That is, a static in time site might provide a view of only one particular window into the past, while an evolving site will offer multiple vantage points, or windows, to past occurrences. As the Horn Mountain Fire Tower currently exists, it is not a static site representing only a sepia toned view of the late 1930s. Various NFsAL initiatives through the years have made this area into an evolving site. The first such evolution to the site occurred in 1957 when the area was designated on the Forest's Recreation Plan as the Horn Mountain Recreation Area. According to that plan infrastructure at the complex consisted of "...a picnic shelter, parking space, tables, fire places, toilets and foot trails. Planned additional facilities consist of three tables, and two fire places and a water supply..." Added to the complex in Fiscal Year 1963 were five picnic tables and two concrete benches. The water supply was upgraded in Fiscal Year 1964 with the addition of a fieldstone encased drinking fountain connected to the well dug in 1963. Also the overlooks were clad in fieldstone in 1964. Thus internal records show that the site was evolving beyond its initial premise by the mid 1960s. What would be considered a true adverse effect to the site by today standards occurred in 1969 when the dwelling was sold and removed from the complex; but at that time the complex was not old enough to be considered a significant historical site. In 1979 an eight foot by eight foot communications control room was constructed adjacent to the fire tower. Shortly thereafter a chain-link fence cage was constructed around the bottom of the tower to prevent the public from climbing the tower stairs. Thus beginning in 1957 when the administrative use of the fire tower complex was changed, the CCC component of the site became relegated to **one** of the components of the site instead of the main component of the site thereby illustrating the evolutionary process at work within the site's boundaries.

What is the potential for the new communications tower to adversely impact the historic integrity of the current Horn Mountain Fire Tower Complex? The affect of

the new tower should be minimal to the significance of the actual historic grounds. As opposed to the plans of a 2008 FEMA communications tower that was evaluated at 200 feet in height and dwarfed the fire tower, the communications tower under current proposal is smaller in stature and width. Although placement of the new tower will diminish certain aesthetic viewpoints of the fire tower, that is, the fire tower will not be the lone above tree height level structure on the horizon for that section of the mountain; it will still be the dominant structure within the view shed along that section of Horn Mountain. The new tower is really nothing more than another, though similar, artifact being deposited on the site. But within the current legal framework, it is still an impact to the historic late 1930s and early 1960s components to the site. A field visit between NFsAL personnel and members of the Alabama SHPO was conducted in June of 2013 to discuss potential alternatives.

During this visit it was decided by all in attendance to develop a mitigation plan for lessening the impact of the new tower to the site. This mitigation plan may actually serve a two-fold purpose: better document the historic 1930s and 1960s components of the site, as well as provide funding for site maintenance that was deferred for the past several years. A detailed topographic map was created by the Supervisor's Office surveyor showing the exact placement of all extant structures, and foundations at the site. We have also worked on the entrance gate into the site and are working with Law Enforcement Officer to provide more site visits to prevent repeated vandalism to the area. As needed we will remove invasive species that detract from the original CCC character of the site

At a minimum this site mitigation plan would involve:

- 1) Photo-documentation and scale line drawings of not just the tower but all remaining structures and structural foundations at a Historical American Building Survey (HABS)/Historical American Engineering Record (HAER) level.
- 2) A cooperative effort between the NFsAL and FFLA will secure funding for a partial restoration of the original Horn Mountain Fire Tower starting with the refurbishment of the stair treads.
- 3) Further partial restoration of the fire tower site will be proper prep and repainting the fire tower, removing the unneeded antenna and cables and stabilizing the masonry overlooks.
- 4) To designate this site as a Passport in Time (PIT) project not only so that all aspects of the site are fully recorded, but to give members of the public with an interest in the site and opportunity to participate in the preservation of the fire tower and the site.
- 5) Begin the nomination process to the Alabama Register of Landmarks and Heritage.
- 6) Interpretive signing explaining the importance of fire towers within the history of the U.S. Forest Service.
- 7) Prepare a short publication about the role of African American CCC enrollees and send it to a journal of popular history.

At present the National Forests in Alabama are corresponding and collaborating with the Advisory Council on Historic Preservation, the CCC Legacy, the Fire Tower Lookout Association, the Native American tribes normally consulted during Talladega Ranger district projects, and other parties that may have an interest in being involved with this project and want to contribute elements to the mitigation plan. The plan will include a timeline and outline of actions formalized in an agreement between all interested parties.

Thus in entering this formal agreement with the above parties for the above actions should mitigate any adverse effects from the new communications tower construction on the site. Also, the construction of the new tower may help give a longevity and interest to the site that was waning due to budgetary constraints. At present, maintenance on the Horn Mountain Fire tower is neglected. As much as it may **seem** counter logical, the construction of the new communications tower (a new component to the site) should breathe real world and budgetary life into the area so that it continues to stay an active, eligible site for the NRHP rather than a ruin it will surely become because it cannot be managed to standard at present due to decreasing budgets.

Threatened, Endangered, and Sensitive Species

During the biological survey, no threatened, endangered, or sensitive species on our current list approved by the US Fish and Wildlife Service (USFWS) were located.

Table 1. Threatened, Endangered, Proposed, and Candidate Species Considered and Included/Excluded from Analysis in EA & BE– Talladega Division. **(List derived from Final EIS, Revised Land and Resource Management Plan PET Species List, NFA, 2004)**

Threatened, Endangered, Proposed, & Candidate Species	USFWS STATUS	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
Red-cockaded woodpecker (<i>Picoides borealis</i>)	Endangered	Open pine forests with large, old trees	Yes	X ¹	
Gray bat (<i>Myotis sodalists</i>)	Endangered	Roost in caves, forages over streams/bodies of water	Potential Use	X ¹	
Indiana bat (<i>Myotis grisescens</i>)	Endangered	Roosts under loose bark summer, caves winter, forages on winged insects	Yes	X ¹	

Threatened, Endangered, Proposed, & Candidate Species	USFWS STATUS	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
Bald eagle (<i>Haliaeetus leucocephalus</i>)	Threatened	Near large bodies of water	Outside of known distribution in state	X ¹	
Tulotoma snail (<i>Tulotoma magnifica</i>)	Threatened	Large rivers on rocks in moderate current	Outside of known distribution in state	X ¹	
Blue shiner (<i>Cyprinella caerulea</i>)	Threatened	Sand/gravel substrates of riffles in mid-order medium to large streams	Shoal Creek Ranger District	X ¹	
Pygmy sculpin (<i>Cottus pygmaeus</i>)	Threatened	Springs, and spring run creeks	Found off of Shoal Creek R.D.	X ¹	
Coosa moccasinshell (<i>Medionidus parvulus</i>)	Endangered	Sand/gravel substrates of riffles in various sized streams & small rivers	Extirpated from Alabama	X ¹	
Southern pigtoe (<i>Pleurobema georgianum</i>)	Endangered	Coarse gravel/sand substrate in moderate current in small rivers/large tributary streams	Shoal Creek R.D. Historic Hatchet Creek	X ¹	
Fine-lined pocketbook (<i>Lampsilis altilis</i>)	Threatened	Sand/mud mixture with gravel in moderate currents & depths	Several small disjunct populations on Division	X ¹	
Upland combshell (<i>Epioblasma metastriata</i>)	Endangered	Stable sand/gravel substrates in riffles of small/medium size rivers	Extirpated from Alabama	X ¹	
Southern acornshell (<i>Epioblasma othcaloogensis</i>)	Endangered	Fine gravel substrates in riffles of rivers & large tributaries above the fall line	Extirpated from Alabama	X ¹	
Alabama moccasinshell (<i>Medionidus acutissimus</i>)	Threatened	Sand/gravel/cobble in shallow water of small streams	No known population on districts	X ¹	

Threatened, Endangered, Proposed, & Candidate Species	USFWS STATUS	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
Southern clubshell (<i>Pleurobema decisum</i>)	Endangered	Coarse gravel/cobble in riffles/runs of large streams /small rivers	Found off district Hatchet Creek	X ¹	
Georgia pigtoe (<i>Pleurobema hanleyianum</i>)	Endangered	Coarse sand/gravel within riffles of small/medium rivers & large tributaries	Extirpated from Alabama	X ¹	
Flat pebblesnail (<i>Lepyrium showalteri</i>)	Endangered	Clean, smooth cobble, boulder or bedrock substrates within high gradient swift current riffles or shoals.	No known population on districts	X ¹	
Painted rocksnail (<i>Leptaxis taeniata</i>)	Threatened	Cobble/slab rapids/shoals in medium to large rivers	Historic records on Shoal Creek	X ¹	
Cylindrical lioplax (<i>Lioplax cyclostomaformis</i>)	Endangered	Mud and shell fragment interstitial spaces among tabular boulders and bedrock slabs.	Locally extirpated	X ¹	
Lacy elimia (<i>Elimia crenatella</i>)	Endangered	Underside of rock slabs or gravel/cobble of medium/large tributary streams	Found off district in Cheaha and Tallaseehatche e Creek	X ¹	
Mohr's Barbara's buttons (<i>Marshallia mohrii</i>)	Threatened	Moist prairie-like openings in woodlands along shale-bedded streams	Found on private lands near district	X ¹	
Alabama leather flower (<i>Clematis socialis</i>)	Endangered	Mesic flats near intermittent streams in silty/clay soils	Found on private lands near district	X ¹	
Harperella (<i>Ptilimnium nodosum</i>)	Endangered	Seasonally flooded streams, coastal plain ponds, and low savannah meadows	Found on private lands near district	X ¹	
Green pitcher plant (<i>Sarracenia oreophila</i>)	Endangered	Moist upland areas or boggy, sandy stream edges	Historic records & Found on private lands near district	X ¹	

Threatened, Endangered, Proposed, & Candidate Species	USFWS STATUS	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
TN yellow-eyed Grass (<i>Xyris tennesseensis</i>)	Endangered	Moist to wet areas year-round, little shade	No known population on district	X ¹	
Georgia aster (<i>Aster georgianus</i>)	Candidate	Roadsides, open woods, barrens and glades, utility rights-of-way. Prefers dry, open habitats independent of soil type	3 known locations on division	X ¹	
White fringeless orchid (<i>Platanthera integrilabia</i>)	Candidate	Wet, boggy areas, stream heads, or seepage slopes in acidic muck or sand in flat or sharply sloped streambanks	6 known locations on division	X ¹	

x¹ = Not found during a survey of the project area during May 2013.

Table 2. Sensitive Species Included/Excluded in Analysis and Rationale

USFS Sensitive Species	Global Rank (*)	State Rank (**)	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
Terrestrial Animals						
Rafinesque's big-eared bat (<i>Corynorhinus rafinesquii</i>)	G3 G4	S2	Roosts in caves, hollow trees and forages over open water and riparian areas	Potential occurrence, no known locations	X ¹	
Eastern small-footed bat (<i>Myotis leibii</i>)	G3	S1	Roosts in caves, hollow trees and forages over open water and riparian areas	Potential occurrence, no known locations	X ¹	
Bachman's sparrow (<i>Aimophila aestivalis</i>)	G3	S3	Open pine woods with thick groundcover of native grasses	Known to occur	X ¹	
Peregrine falcon (<i>Falco peregrinus</i>)	G4	S3	Undisturbed areas near water with wide view and close to prey, tall cliffs & rock outcrops	No known locations	X ¹	

USFS Sensitive Species	Global Rank (*)	State Rank (**)	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
Diana fritillary (<i>Speyeria Diana</i>)	G3	S3	Hardwood woodlands, and mixed pine/hardwood woodlands	Known to occur	X ¹	
Frosted elfin (<i>Callophrys irus</i>)	G3	SU	Early-successional forests and woodlands, and savannas	Potential occurrence, no known locations	X ¹	
Plants						
A liverwort (<i>Plagiochila echinata</i>)	G2	SNR	Cliff habitat, late-successional riparian forests, & bases of cliff bluffs	Known to occur	X ¹	
Little Georgia moss (<i>Tetradontium brownianum</i>)	G3	SNR	Rock outcrops, cliffs, spray cliffs, and late-successional riparian habitat	Known to occur	X ¹	
Small-flowered buckeye (<i>Aesculus parviflora</i>)	G2 G3	S2	Open woodlands, often in a mesic hardwood community	Known to occur	X ¹	
Georgia aster (<i>Aster georgianus</i>)	G2 G3	S2S3	Roadsides, open woods, barrens and glades, utility rights-of-way. Prefers dry, open habitats independent of soil type.	Known to occur	X ¹	
Alabama Grapefern (<i>Botrichium jenmenii</i>)	G3 G4	SH	Canopy gaps in moist woods & open woodlands and grasslands on drier sites	Known to occur	X ¹	
Kral's Indian paintbrush (<i>Castilleja kraliana</i>)	G2	S2	Dry sand hills and montane longleaf pine communities	Potential occurrence, no known locations	X ¹	
Whorled horsebalm (<i>Colinsonia verticillata</i>)	G3	SNR	Well drained, moist substrates	Known to occur	X ¹	
Large witchalder (<i>Fothergilla major</i>)	G3	S2	Ridgetops, dry & rocky longleaf forests and open woodland settings often over sandstone	Known to occur	X ¹	
Longleaf sunflower (<i>Helianthus longifolius</i>)	G3	S1S2	Glades & barrens as well as rocky ridgetops	Known to occur	X ¹	

USFS Sensitive Species	Global Rank (*)	State Rank (**)	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
Smith's sunflower (<i>Helianthus smithii</i>)	G2 Q	S2	Dry rocky ridgetops & mountain longleaf slopes.	Known to occur	X ¹	
Harper's wild ginger (<i>Hexastylis shuttleworthii</i> var. <i>harperi</i>)	G4 T3	S2	Moist shaded hardwood slopes and rich soils	Known to occur	X ¹	
Carolina spider lily (<i>Hymenocallis caroliniana</i>)	G2 Q	SNR	River corridors, sandbanks, cobbles, stream scours and riparian habitat	Known to occur	X ¹	
Alabama warbonnet (<i>Jamesianthus alabamaensis</i>)	G3	S3	Moist shaded-to-partially-sunny riparian forest, alluvial deposits, basic mesic or circumneutral soils		X ¹	
Butternut (<i>Juglans cinerea</i>)	G3 G4	S1	Moist shaded-to-partially-sunny riparian forests, alluvial deposits, basic mesic or circumneutral soils, streambanks, bluffs	Potential occurrence, no known locations	X ¹	
Fraser's yellow loosestrife (<i>Lysimachia fraseri</i>)	G2	S1	River corridors, sandbanks, cobbles, stream scours and riparian habitat	Known to occur	X ¹	
Broadleaf Barbara's buttons (<i>Marshallia trinervia</i>)	G3	S3	Open canopy with little to no shrub competition in bogs, seeps, and streambanks	Known to occur	X ¹	
Alabama snow-wreath (<i>Neviusia alabamensis</i>)	G2	S2	Canopy gaps in basic mesic forests and late successional riparian forests	Potential occurrence, no known locations	X ¹	
White fringeless orchid (<i>Platanthera integrilabia</i>)	G2 G3	S2	Wet, boggy areas, streamheads or seepage slopes in acidic muck or sand in flat or sharply sloped streamside areas	Known to occur	X ¹	
Clammy locust (<i>Robinia viscosa</i>)	G3	SU	Dry sandy soils, rocky slopes around small drain heads.	Known to occur	X ¹	

USFS Sensitive Species	Global Rank (*)	State Rank (**)	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
Eared coneflower Eared coneflower (<i>Rudbeckia auriculata</i>)	G1	S1	Moist shaded-to-partially-sunny riparian forests, alluvial deposits, basic mesic or circumneutral soils, streambanks	Known to occur	X ¹	
Pinnate-lobed black-eyed Susan (<i>Rudbeckia triloba</i> var <i>pinnatiloba</i>)	G5T3	S2S3	Moist shaded hardwood slopes & rich soils as well as overlap into the late-successional riparian forest	Known to occur	X ¹	
Appalachian rose gentian (<i>Sabatia capitata</i>)	G2	S2	Dry sandy soils, rocky slopes and moderately open stands	Known to occur	X ¹	
Alabama skullcap (<i>Scutellaria alabamensis</i>)	G2	S2	Light to deep shade in fine sands or sandy loams, well drained moist substrates.	Known to occur	X ¹	
Nevius' stonecrop (<i>Sedum nevii</i>)	G3	S3	Moist shaded-to-partially-sunny riparian forests, alluvial deposits, basic mesic or circumneutral soils, streambanks, bluffs and rises in rich coves	Known to occur	X ¹	
Piedmont meadowrue (<i>Thalictrum macrostylum</i>)	G1G2Q	SNR	Moist shaded hardwood slopes and rich soils	Known to occur	X ¹	
Lanceleaf trillium (<i>Trillium lancifolium</i>)	G3	S2S3	Moist shaded-to-partially-sunny riparian forests, alluvial deposits, basic mesic or circumneutral soils, streambanks, bluffs and rises in moist sandy bottoms	Known to occur	X ¹	
Southern nodding trillium (<i>Trillium rugelii</i>)	G3	S2?	Moist shaded-to-partially-sunny riparian forests, alluvial deposits, basic mesic or circumneutral soils, streambanks, bluffs and rises in moist sandy bottoms	Known to occur	X ¹	
Holiday darter (<i>Etheostoma brevirostrum</i>)	G2	S2	Clear cool, moderate to swift currents over cobble-boulder-gravel substrates within relatively shallow portions of runs, pools and sometimes riffles of medium to large streams	Locally common Shoal Creek	X ¹	
Coldwater darter (<i>Etheostoma ditrema</i>)	G1G2	S1	Shallow slow currents over well-vegetated, coarse organic debris substrates within springs and spring-runs of small streams	Rare	X ¹	

USFS Sensitive Species	Global Rank (*)	State Rank (**)	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
Coal darter (<i>Percina brevicauda</i>)	G2	S2	Swift currents over gravel-cobble-sand substrates within bedrock troughs at the foot of rapids or riffle heads of large streams and rivers	Near	X ¹	
Freckled darter (<i>Percina lenticula</i>)	G2	S3	Deep swift currents over sand substrates within runs and rapids of main channel large streams and rivers	Near	X ¹	
A crayfish (<i>Cambarus englishi</i>)	G3	S3	Various substrates within riffle and pool habitats of streams	Near	X ¹	
Alabama spike (<i>Elliptio arca</i>)	G3	S2	High gradient swift currents over gravel substrates within lateral bars and riffles of large streams and rivers	Potential	X ¹	
Tennessee heelsplitter (<i>Lasmigona holstonia</i>)	G3	S2	Shallow water of various currents over sand and mud substrates within riffles of small headwater and tributary streams and small spring runs, and occasionally backwaters and side channel pools of large rivers	Locally common Shoal Creek	X ¹	
Ridged mapleleaf (<i>Quadrula rumphiana</i>)	G3	S1S2	Moderate gradient slow to fast currents over sand-gravel substrates within medium sized rivers and reservoirs	Near	X ¹	
Alabama creekmussel (<i>Strophitus connasauganesis</i>)	G3	S2	Small streams to rivers in areas of moderate current and sand-gravel substrates	Locally Common	X ¹	
Alabama rainbow (<i>Villosa nebulosa</i>)	G3	S3	Small streams to rivers in areas with some current and sand-gravel substrates	Uncommon	X ¹	

USFS Sensitive Species	Global Rank (*)	State Rank (**)	Habitat	Occurrence on Talladega Division	Considered but Excluded from Analysis	Considered in EA/BE
Coosa combshell (<i>Villosa vanuxemensis umbrans</i>)	G4 T2	S2	Small streams to medium rivers in areas with moderate current and sand-gravel substrates	Locally Common	X ¹	
Helma's net-spinning caddisfly (<i>Cheumatopsyche helma</i>)	G1 G3	S1	Bottom dwellers within small headwater streams	Rare	X ¹	
A caddisfly (<i>Hydroptila cheaha</i>)	G1	S1	May inhabit springs and small spring-fed streams	Historic	X ¹	
A caddisfly (<i>Hydroptila choco loco</i>)	G1	S1	May inhabit springs and small spring-fed streams	Locally common	X ¹	
A caddisfly (<i>Hydroptila patriciae</i>)	G1	S1	Presumably they inhabit small streams	Near	X ¹	
A caddisfly (<i>Hydroptila setigera</i>)	G1	S1	Primarily inhabits small headwater streams of the lower Appalachian Mountains	Near	X ¹	
Alleghany snaketail (<i>Ophiogomphus incurvatus alleghaniensis</i>)	G3 Q	S1S2	Primarily inhabit flowing currents over cobble-gravel-mud substrates within shallow riffles of spring-fed small to medium sized "pristine" streams	Common	X ¹	
Carlson's polycentropus caddisfly (<i>Polycentropus carlsoni</i>)	G1 G3	S1	Benthic dwellers in very small streams	Rare	X ¹	

X¹ = Species not found during survey of project area in May of 2013

Table 3. Management Indicator Species (MIS) selected for use in the EA from MIS species listed in the Forest Plan.

Common Name	Reason for Selection & Applicable Management Unit	Selected for analysis
Red-cockaded Woodpecker	To help indicate management effects to mid- and late-successional pine and pine-oak forest. Applicable to Talladega and Conecuh National Forests.	No
Pileated woodpecker	To help indicate management effects to snag dependent wildlife species. Applicable to all NFAL management units.	No
Wood thrush	To help indicate management effects on wildlife species dependent upon mature forest interior conditions. Applicable to all NFAL management units.	No
Acadian flycatcher	To help indicate management effects within mature riparian forest community. Applicable to all NFAL management units.	No
Swainson's warbler	To help indicate management effects within the early successional riparian forest community. Applicable to all NFAL management units.	No
White-tailed deer	To help indicate management effects on meeting hunting demand for this species. Applicable to all NFAL management units.	No
Eastern wild turkey	To help indicate management effects on meeting hunting demand for this species. Applicable to all NFAL management units.	No
Northern bobwhite quail	To help indicate management effects on meeting hunting demand for this species. Applicable to all NFAL management units.	No
Hooded warbler	To help indicate management effects on mesic deciduous forest and mesic oak and oak-pine forest communities Applicable to all NFAL management units.	No
Scarlet tanager	To help indicate management effects on xeric oak and oak-pine forest communities. Applicable to Bankhead NF and Talladega Division.	No
Brown-headed nuthatch	To help indicate management effects on the pine and pine-oak forest community. Applicable to the Talladega, Bankhead and Tuskegee National Forests.	No
Prairie Warbler	To help indicate management effects on creating and maintaining early successional forest (low elevation) communities and other early successional habitats. Applicable to all NFAL management units.	No

No MIS were selected for analysis due to small project area and presence of mostly non-native trees with little suitable habitat present for MIS species.

Federal, State, or Local Laws

This site is currently licensed by the Federal Communications Commission as a communication site. The height of the planned tower will not require warning lights per Federal Aviation Administration regulations.

The proposed tower and related work is consistent with Forest Plan direction and would not inhibit protection of the environment.

Goals, Objectives, and Standards:

Goals

Goal 30 – Manage areas with special paleontological, cultural, or heritage characteristics to maintain or restore those characteristics.

Standards

FW-113 – Protection of firefighters and the public is the first priority in all fire management actions.

FW-148 – Coordinate inventory, evaluation, nomination, protection, enhancement, and interpretation procedures with the Alabama State Historic Preservation Officer (SHPO), Advisory Council on Historic Preservation (ACHP), and Tribal Historic Preservation Officer (THPO) as necessary before project decisions.

FW-149 – All coordination relating to the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800) will also tier to any programmatic agreements, MOUs, MOAs or other agreements between the Forest and SHPO.

Laws

36 CFR Part 800—Protection of Historic Properties, NHPA of 1966 as amended in 2004

800.5 Assessment of Adverse Effects

- (v)—Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant feature.
- (vi)—Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization.

CONSULTATION AND COORDINATION

The Forest Service consulted the following individuals, Federal, State, and local agencies, tribes and non-Forest Service persons during the development of this environmental assessment:

ID TEAM MEMBERS:

- Jeremy Brand – Zone Assistant Fire Management Officer
- Scott Layfield – Zone Fire Management Officer
- David Rasmussen – Engineering
- Leigh Agan – Fire Prevention Technician
- Erika Davis – Engineering
- Marcus Ridley – Heritage Resources
- Frank Taylor – Telecommunications Technician

FEDERAL, STATE, AND LOCAL AGENCIES:

- USDA Forest Service
- US Fish and Wildlife Service
- Alabama Forestry Commission
- Alabama Historical Commission
- Alabama SHPO
- Advisory Council on Historic Preservation

TRIBES:

- Poarch Creek Indians
- Alabama-Quassarte
- Chickasaw Nation

OTHERS:

- CCC Legacy
- Fire Tower Lookout Association
- Hamm Operators (Jim McIlwain)
- Art Henderson -Talladega Wildlife Biologist